

Exhibit 11

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CAUSE NO. D-1-GN-18-001605

MARCEL FONTAINE,) IN THE DISTRICT COURT
)
Plaintiff,)
)
vs.) TRAVIS COUNTY, TEXAS
)
INFOWARS, LLC, FREE)
SPEECH SYSTEMS, LLC, and)
KIT DANIELS,)
)
Defendants.) 261ST JUDICIAL DISTRICT

ORAL AND VIDEOTAPED DEPOSITION OF
BRITTANY PAZ, CORPORATE REPRESENTATIVE OF
FREE SPEECH SYSTEMS, LLC
February 15, 2022

ORAL AND VIDEOTAPED DEPOSITION OF BRITTANY PAZ,
CORPORATE REPRESENTATIVE OF FREE SPEECH SYSTEMS, LLC,
produced as a witness at the instance of the Plaintiff
and duly sworn, was taken in the above-styled and
numbered cause on February 15, 2022, from 9:03 a.m. to
3:34 p.m., before Amy M. Clark, Certified Shorthand
Reporter in and for the State of Texas, reported by
computerized stenotype machine at the offices of Kirker
Davis, LLP, 8310-I North Capital of Texas Highway, Suite
350, Austin, Texas 78731, pursuant to the Texas Rules of
Civil Procedure and the provisions stated on the record
or attached hereto.

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<p>2</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 FOR PLAINTIFF:</p> <p>4 Mr. Bill Ogden</p> <p>Mr. Mark Bankston</p> <p>5 Kaster Lynch Farrar & Ball, LLP</p> <p>1117 Herkimer Street</p> <p>6 Houston, Texas 77008</p> <p>Telephone: (713)221-8300</p> <p>7 Fax: (713)221-8301</p> <p>Email: bill@fbtrial.com</p> <p>8 Email: mark@fbtrial.com</p> <p>9 FOR DEFENDANTS:</p> <p>10 Ms. Jacquelyn Blott</p> <p>Law Office of Jacquelyn W. Blott</p> <p>11 200 University Boulevard</p> <p>Suite 225, No. 251</p> <p>12 Round Rock, Texas 78665</p> <p>Telephone: (512)639-9904</p> <p>13 Email: jblott@jblottlaw.com</p> <p>14 ALSO PRESENT:</p> <p>15 Mr. Manuel Martin, Videographer</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>4</p> <p>1 EXHIBITS (cont.)</p> <p>2 EXHIBIT DESCRIPTION PAGE</p> <p>3 Exhibit 9 Defendant's Answers to 148</p> <p>Plaintiff's Second Set of</p> <p>Interrogatories</p> <p>4</p> <p>5 Exhibit 10 Photograph 159</p> <p>6 Exhibit 11 Post from 4chan 162</p> <p>7 Exhibit 12 Infowars internal system screen 168</p> <p>capture</p> <p>8</p> <p>Exhibit 13 Defendant's Answer to 176</p> <p>9 Interrogatory Regarding Net</p> <p>Worth</p> <p>10</p> <p>Exhibit 14 Profit & Loss, 2020 184</p> <p>11</p> <p>Exhibit 15 Balance Sheet, 12/31/20 195</p> <p>12</p> <p>Exhibit 16 Income statement 195</p> <p>13</p> <p>Exhibit 17 UCC Financing Statement 196</p> <p>14</p> <p>Exhibit 18 Notepad 219</p> <p>15</p> <p>Exhibit 18A Handwritten notes about 254</p> <p>16 conversation with Mr. Jones</p> <p>17 Exhibit 18B Handwritten notes, 2/14/22 261</p> <p>18 Exhibit 18C Handwritten notes, 2/15/22 262</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>3</p> <p>1</p> <p>2 INDEX</p> <p>3 PAGE</p> <p>4 Appearances2</p> <p>5 BRITTANY PAZ, CORPORATE REPRESENTATIVE OF</p> <p>FREE SPEECH SYSTEMS, LLC</p> <p>6</p> <p>Examination by Mr. Ogden5</p> <p>7 Examination by Ms. Blott265</p> <p>Further Examination by Mr. Ogden268</p> <p>8 Signature Page280</p> <p>Court Reporter's Certificate283</p> <p>9</p> <p>10 EXHIBITS</p> <p>11 EXHIBIT DESCRIPTION PAGE</p> <p>12 Exhibit 1 Email from Kit Daniels to 31</p> <p>Infowars Staff, 6/7/18</p> <p>13</p> <p>Exhibit 2 Web message, Use the links on 97</p> <p>14 the left to browse saved web</p> <p>pages.</p> <p>15</p> <p>Exhibit 3 Web search message, Page no 97</p> <p>16 longer available</p> <p>17 Exhibit 4 Defendant's Amended Responses 117</p> <p>to Plaintiff's First Request</p> <p>for Production</p> <p>18</p> <p>19 Exhibit 5 Defendant's Responses to 125</p> <p>Plaintiff's Second Request for</p> <p>Production</p> <p>20</p> <p>21 Exhibit 6 Defendant's First Supplemental 137</p> <p>Answers to Plaintiff's First</p> <p>Set of Interrogatories</p> <p>22</p> <p>23 Exhibit 7 Social media post 140</p> <p>24 Exhibit 8 Prison Planet dot com post 141</p> <p>25</p>	<p>5</p> <p>1 THE VIDEOGRAPHER: We are on the record on</p> <p>2 February 15th, 2022 at 9:03 a.m. This is the videotaped</p> <p>3 deposition of Brittany Paz.</p> <p>4 BRITTANY PAZ, CORPORATE REPRESENTATIVE OF FREE SPEECH</p> <p>5 SYSTEMS, LLC,</p> <p>6 having been first duly sworn, testified as follows:</p> <p>7 EXAMINATION</p> <p>8 BY MR. OGDEN</p> <p>9 Q. Could you please introduce yourself to the</p> <p>10 jury.</p> <p>11 A. Sure. My name is Brittany Paz.</p> <p>12 MS. BLOTT: And, just for the record,</p> <p>13 we're gonna take this subject to the protective order</p> <p>14 that's been entered in this case.</p> <p>15 MR. OGDEN: Okay.</p> <p>16 MR. BANKSTON: There's no protective -- is</p> <p>17 there a protective? I don't think we have one. I'm not</p> <p>18 sure we do.</p> <p>19 MS. BLOTT: Okay.</p> <p>20 MR. OGDEN: I don't think we do.</p> <p>21 MS. BLOTT: My apologies. I will have to</p> <p>22 check that.</p> <p>23 THE WITNESS: Before we get started, can I</p> <p>24 amend something that we talked about yesterday?</p> <p>25 MR. OGDEN: It's kind of a different case.</p>

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<p>6</p> <p>1 THE WITNESS: Well, I --</p> <p>2 MR. BANKSTON: You get to read and sign.</p> <p>3 MS. BLOTT: No. No. No. She --</p> <p>4 THE WITNESS: Well, I want to add</p> <p>5 something. Just -- it was on the subject of -- Attorney</p> <p>6 Bankston asked me about a Bloomberg article that was</p> <p>7 referenced by Mr. Jones. And I didn't know which</p> <p>8 article it was. But I located the article. So I just</p> <p>9 wanted to bring it to your attention and put it on the</p> <p>10 record.</p> <p>11 MR. OGDEN: I don't --</p> <p>12 MS. BLOTT: It's an entirely different</p> <p>13 deposition.</p> <p>14 THE WITNESS: Yeah. Okay. Okay.</p> <p>15 MR. OGDEN: Different case, different</p> <p>16 subject matter.</p> <p>17 THE WITNESS: Okay. Well, I guess</p> <p>18 Attorney Blott can email you.</p> <p>19 MR. BANKSTON: We're not terribly</p> <p>20 concerned with what your attorney's prepared you on</p> <p>21 after your obligations for that deposition.</p> <p>22 THE WITNESS: It wasn't --</p> <p>23 MS. BLOTT: I'm gonna object. Because --</p> <p>24 THE WITNESS: It wasn't anything she</p> <p>25 prepared me on. But, okay.</p>	<p>8</p> <p>1 representative.</p> <p>2 What does that mean to you?</p> <p>3 A. It means that I am a fact witness on behalf of</p> <p>4 the company.</p> <p>5 Q. Okay. And does that job require -- have</p> <p>6 responsibilities with it?</p> <p>7 A. I think I was tasked and have the</p> <p>8 responsibility to speak -- speak coherently on what the</p> <p>9 company knows or knew at the time that the allegations</p> <p>10 were made about the allegations in his petition.</p> <p>11 Q. And that's it?</p> <p>12 A. In relation to this case?</p> <p>13 Q. Yes.</p> <p>14 A. Yes.</p> <p>15 Q. Okay.</p> <p>16 MR. OGDEN: Do you have a copy of the</p> <p>17 notice?</p> <p>18 MR. BANKSTON: It ought to be in your</p> <p>19 book. I can show it to you.</p> <p>20 MR. OGDEN: Yeah.</p> <p>21 MR. BANKSTON: One second.</p> <p>22 Q. (By Mr. Ogden) When were you retained to be the</p> <p>23 corporate representative in this case?</p> <p>24 A. It was at the same time as what the previous</p> <p>25 case is. So January 31st, February 1st, around that</p>
<p>7</p> <p>1 MS. BLOTT: Go ahead.</p> <p>2 MR. BANKSTON: Well, I mean, just because</p> <p>3 this is put on the record, and it may be used in the</p> <p>4 Sandy Hook case, and I was taking that deposition. It's</p> <p>5 our position, Ms. Paz was ordered by the Court to appear</p> <p>6 yesterday for a deposition, prepped on those topics. We</p> <p>7 do not feel she was prepared. And anything she did last</p> <p>8 night, after the obligation of the deposition, is</p> <p>9 completely irrelevant to us. That's our position on the</p> <p>10 Sandy Hook case.</p> <p>11 Q. (By Mr. Ogden) All right. So what -- Ms. Paz,</p> <p>12 what do you do for a living?</p> <p>13 A. I am a practicing attorney in Connecticut.</p> <p>14 Q. Today we are obviously in Austin, Texas.</p> <p>15 You're not gonna be practicing law today,</p> <p>16 correct?</p> <p>17 A. No.</p> <p>18 Q. What are you -- what were you tasked with doing</p> <p>19 today?</p> <p>20 A. For this deposition?</p> <p>21 Q. Yes.</p> <p>22 A. In the Fontaine deposition, I was tasked with</p> <p>23 being the corporate representative for Free Speech in</p> <p>24 relationship to the petition that he filed.</p> <p>25 Q. And you just used the term corporate</p>	<p>9</p> <p>1 time. It's about two weeks ago.</p> <p>2 Q. Who retained you?</p> <p>3 A. The company.</p> <p>4 Q. No. Who specifically?</p> <p>5 A. I believe Mr. Jones retained me.</p> <p>6 Q. He called you?</p> <p>7 A. Did I speak directly to him at the time? No.</p> <p>8 I spoke to Attorney Blott.</p> <p>9 Q. So Ms. Blott reached out to you to be the</p> <p>10 corporate representative?</p> <p>11 A. And Mr. -- and Mr. Pattis.</p> <p>12 Q. Okay.</p> <p>13 A. So Attorney Blott and Mr. Pattis.</p> <p>14 Q. Was it kind of like a conference call with</p> <p>15 everybody on it, or did Mr. Pattis call you and then</p> <p>16 Ms. Blott called you?</p> <p>17 A. I think Mr. Pattis called me and then Attorney</p> <p>18 Pattis called me.</p> <p>19 Q. Okay. And you have a relationship with</p> <p>20 Mr. Pattis, correct?</p> <p>21 A. I have a prior professional relationship with</p> <p>22 Attorney Pattis, yes.</p> <p>23 Q. Okay. Do you have any personal relationship</p> <p>24 with him in any way, as you sit here today?</p> <p>25 A. No.</p>

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<p>10</p> <p>1 Q. So y'all aren't friends?</p> <p>2 A. I wouldn't consider us friends. I consider us</p> <p>3 work colleagues.</p> <p>4 Q. When Mr. Pattis called you to be the corporate</p> <p>5 representative for Free Speech Systems and Infowars,</p> <p>6 LLC, what was your reaction?</p> <p>7 A. I don't know that I had a reaction. He had a</p> <p>8 need for someone to serve as the corporate</p> <p>9 representative. He asked if I would be able to do so,</p> <p>10 given the time constraints and my other work</p> <p>11 obligations. I considered it. We had some discussions</p> <p>12 about it; and, ultimately, we decided it would work.</p> <p>13 Q. You understand that Free Speech Systems and</p> <p>14 Infowars, LLC have had a couple different corporate</p> <p>15 representatives previously, correct?</p> <p>16 A. Yes.</p> <p>17 Q. And so -- and when Mr. Pattis retained you, did</p> <p>18 he tell you that time constraint of you only have two</p> <p>19 weeks to prepare?</p> <p>20 A. Yes. I was aware. I think I had already seen</p> <p>21 the deposition notice.</p> <p>22 Q. And did -- when Mr. Pattis was telling you</p> <p>23 about the time constraints, did he also mention the</p> <p>24 amount of work and materials that would go into being</p> <p>25 prepared for these depositions?</p>	<p>12</p> <p>1 be prepared to do, would that be something you'd</p> <p>2 probably find helpful as you were getting started in</p> <p>3 preparing for these depositions?</p> <p>4 A. Would I have found it helpful to have read the</p> <p>5 transcripts?</p> <p>6 Q. Of what the judge specifically said for you, as</p> <p>7 the corporate representative, to be prepared to do in</p> <p>8 these rooms the last two -- yesterday and today?</p> <p>9 A. Sure. It would have been helpful. But I did</p> <p>10 review the depo notice.</p> <p>11 Q. So if the judge said, I expect every single</p> <p>12 document to be read, would you understand that to mean</p> <p>13 that the corporate representative that sits down for</p> <p>14 these depositions should have reviewed every single document?</p> <p>15 A. I don't know that that's what was said.</p> <p>16 Q. I'm not asking you if you know that that's what</p> <p>17 was said.</p> <p>18 I'm saying: If the judge said that, you</p> <p>19 would understand that to mean whoever's sitting in the</p> <p>20 chair that you were sitting in right now should've</p> <p>21 reviewed every single document that was produced in</p> <p>22 discovery?</p> <p>23 A. I don't know. I don't know the answer -- how</p> <p>24 to answer that. I don't think it's possible for one</p> <p>25 person to read all those documents.</p>
<p>11</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And so he told you, Mr. Pattis did, that</p> <p>3 you'd have to review over a hundred thousand pages of</p> <p>4 documents?</p> <p>5 A. He said that there were those types of volumes</p> <p>6 of documents that were a part of the case, yes.</p> <p>7 Q. And you agreed that you were, you know,</p> <p>8 able-bodied enough to be able to be prepared and review</p> <p>9 every single one of those documents?</p> <p>10 A. I don't think anyone is able to review every</p> <p>11 single one of those documents. I think what I was</p> <p>12 tasked to do is try to be as prepared as possible, given</p> <p>13 the time constraints, because the Court ordered a</p> <p>14 corporate representative to come in and cogently talk</p> <p>15 about these topics. And I did that to best of my</p> <p>16 ability.</p> <p>17 Q. Okay. And did Mr. Pattis tell you that the</p> <p>18 judge in these cases on the record -- and we have the</p> <p>19 transcript -- went into pretty good amount of detail as</p> <p>20 to what she expected out of you as the corporate</p> <p>21 representative in these depositions? Did you know that?</p> <p>22 A. I didn't read the transcript, and I don't think</p> <p>23 he read the transcript. I read the deposition notice.</p> <p>24 Q. As we sit here today, if the judge had</p> <p>25 expectations of what a corporate representative should</p>	<p>13</p> <p>1 Q. I think you're right.</p> <p>2 So would it surprise you to know that the</p> <p>3 judge, on the record -- we have the transcript, if you'd</p> <p>4 like to review it on break -- said this would likely</p> <p>5 require multiple corporate representative designees for</p> <p>6 different topics to share the brunt of what would be</p> <p>7 expected.</p> <p>8 Did you know that?</p> <p>9 A. I don't know. Like I said, I haven't reviewed</p> <p>10 the transcript.</p> <p>11 Q. Right. But one thing we can agree on is that</p> <p>12 you don't have the capacity to be fully prepared to</p> <p>13 discuss the topics in detail for the depo notices from</p> <p>14 today and yesterday?</p> <p>15 A. No.</p> <p>16 Q. No. You don't agree with that?</p> <p>17 A. No. I don't agree with that.</p> <p>18 Q. Well, you said just a second ago, to the best</p> <p>19 of your ability, not I'm completely prepared.</p> <p>20 So which is it?</p> <p>21 A. I think that I have reviewed documents that are</p> <p>22 relevant and to be prepared to talk on the topics that</p> <p>23 the deposition has noticed me for.</p> <p>24 Q. That didn't answer my question.</p> <p>25 A. I think it did.</p>

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<p style="text-align: right;">14</p> <p>1 Q. Okay. What was my question?</p> <p>2 A. Your question was whether or not I am able to</p> <p>3 testify as to the topics in this -- in this deposition</p> <p>4 that were noticed as per Mr. Fontaine, and I am able to</p> <p>5 do that.</p> <p>6 Q. Okay. That wasn't my question. But we'll just</p> <p>7 move on from there.</p> <p>8 How much are you being paid?</p> <p>9 A. As I testified yesterday, this --</p> <p>10 Q. For this case, and this case only, how much are</p> <p>11 you being paid?</p> <p>12 A. It was the same amount as the -- as the case</p> <p>13 yesterday. So as I testified yesterday, I was paid a</p> <p>14 flat fee of \$30,000, and it encompassed both cases.</p> <p>15 Q. Okay. How much did you --</p> <p>16 MR. OGDEN: I -- I'm not everyone. Okay.</p> <p>17 Q. (By Mr. Ogden) How much of the \$30,000 was for</p> <p>18 today?</p> <p>19 A. It wasn't divided up or allocated. It was just</p> <p>20 a flat \$30,000 for the both cases.</p> <p>21 (Sotto voce conversation between Mr. Ogden</p> <p>22 and Mr. Bankston.)</p> <p>23 Q. (By Mr. Ogden) So the \$30,000 that you were</p> <p>24 paid was not allocated to the specific time that was</p> <p>25 done, rather it was just a flat fee to encompass all of</p>	<p style="text-align: right;">16</p> <p>1 time.</p> <p>2 Q. Okay. For this case specifically, how many</p> <p>3 hours did you take preparing?</p> <p>4 A. So with the document review of the -- just</p> <p>5 specifically related to Mr. Fontaine, including the</p> <p>6 interviews that I had with Mr. Daniels and other</p> <p>7 employees in connection with this case, I would say</p> <p>8 probably in the neighborhood of 10 hours. That also</p> <p>9 includes preparation with the attorneys discussing the</p> <p>10 case.</p> <p>11 Q. So 10 hours total?</p> <p>12 A. Probably, yes.</p> <p>13 Q. Okay. Do you remember how many topics were on</p> <p>14 the deposition notice?</p> <p>15 A. I believe there were eight.</p> <p>16 Q. All right. So you spent roughly 1.25 -- an</p> <p>17 hour and 15 minutes per topic?</p> <p>18 A. Well, that doesn't -- you told me specifically</p> <p>19 related to Fontaine.</p> <p>20 Q. Correct.</p> <p>21 A. So I testified that it's taken a hundred hours</p> <p>22 of review time total to review all of the documents. So</p> <p>23 I think that per the eight topics, if we're dividing</p> <p>24 them up, that would include all hundred hours. But the</p> <p>25 Fontaine documents specifically, it was about 10 hours.</p>
<p style="text-align: right;">15</p> <p>1 it?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Where did that number come from?</p> <p>4 A. I believe I testified yesterday that we had --</p> <p>5 that there was a starting number and that we negotiated</p> <p>6 from there.</p> <p>7 Q. Okay. Okay. What was the starting number?</p> <p>8 A. I believe it was 25,000, and then I negotiated</p> <p>9 back at 30.</p> <p>10 Q. Okay. Where did you get that number?</p> <p>11 A. Just given the amount of time that I thought it</p> <p>12 would take, how many documents I would have to review,</p> <p>13 how much -- how much time constraints there were with</p> <p>14 the case, that's -- I thought it was a fair number.</p> <p>15 Q. Right. And I'm trying to figure out, why</p> <p>16 did -- how did you come to the idea that \$30,000 was</p> <p>17 fair?</p> <p>18 A. As I just testified, the time that I thought it</p> <p>19 would require, the documents I would have to review, and</p> <p>20 the time constraints involved in the case; that's how I</p> <p>21 came to that number.</p> <p>22 Q. How much time did you think it would require?</p> <p>23 A. I would think it would require as much time as</p> <p>24 I could dedicate to it. But, ultimately, it ended up</p> <p>25 requiring probably around a hundred hours of review</p>	<p style="text-align: right;">17</p> <p>1 Q. Right.</p> <p>2 A. Right.</p> <p>3 Q. And there's eight topics for the Fontaine</p> <p>4 case --</p> <p>5 A. Right.</p> <p>6 Q. -- which is why we're here today, right?</p> <p>7 A. Right. That would also include the Sandy Hook</p> <p>8 discovery. So that would include a hundred hours of</p> <p>9 dis- -- of review of that material.</p> <p>10 Q. Are they -- tell me how they're related.</p> <p>11 A. A lot of those questions have to do with the</p> <p>12 company and the business structure of the company and</p> <p>13 the information about the -- I might be referring to the</p> <p>14 other deposition notice.</p> <p>15 Q. I think you are.</p> <p>16 A. Okay.</p> <p>17 Q. Okay. I can print this out, if you need it.</p> <p>18 A. Sure.</p> <p>19 Q. (Inaudible.)</p> <p>20 A. I don't recall off the top of my head which</p> <p>21 ones those are.</p> <p>22 Q. Yesterday you came in and you had a pretty,</p> <p>23 color-coded, tabbed-up binder with a lot of information</p> <p>24 in it.</p> <p>25 You remember that?</p>

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<p>18</p> <p>1 A. Yes.</p> <p>2 Q. And today you don't have anything?</p> <p>3 A. That was marked as an exhibit for that</p> <p>4 deposition.</p> <p>5 Q. Was there something in that binder that you</p> <p>6 would have needed for today?</p> <p>7 A. Most of that binder were the video discoveries,</p> <p>8 the video -- I'm sorry -- not video discoveries. The</p> <p>9 summaries that I had of the videos specifically related</p> <p>10 to Sandy Hook.</p> <p>11 Q. Okay. Right. So we don't need those.</p> <p>12 A. I don't think we were talking about those for</p> <p>13 the Fontaine case.</p> <p>14 Q. Correct.</p> <p>15 A. Right.</p> <p>16 Q. So you didn't bring anything with you today for</p> <p>17 this case?</p> <p>18 A. Aside from the supplemental dis- -- production</p> <p>19 that we produced yesterday.</p> <p>20 Q. Okay. And have you reviewed all of that</p> <p>21 production?</p> <p>22 A. I believe so, yes.</p> <p>23 Q. When did you review it?</p> <p>24 A. Sometime last week and through the weekend.</p> <p>25 Q. So that supplemental production was prepared</p>	<p>20</p> <p>1 A. You could round it.</p> <p>2 Q. Okay. So you got an additional 140 pages this</p> <p>3 morning?</p> <p>4 A. Yes.</p> <p>5 Q. And you were able to review those fully?</p> <p>6 A. I haven't read each and every line of these,</p> <p>7 no.</p> <p>8 Q. Have you looked at every single page, at least?</p> <p>9 A. I did try to look at each and every single</p> <p>10 page. But...</p> <p>11 Q. I didn't ask if you tried, Ms. Blott -- excuse</p> <p>12 me, Ms. Paz. I asked if you have looked at every page</p> <p>13 prior to you flipping through --</p> <p>14 A. I don't know that I looked at every page.</p> <p>15 Q. Okay. So it's safe to say if one of the</p> <p>16 expectations today was to be able to testify to the</p> <p>17 discovery produced, there's probably some things in</p> <p>18 there you're not prepared to do, considering you haven't</p> <p>19 reviewed it all?</p> <p>20 A. Well, it was filed this morning -- or yesterday</p> <p>21 morning. So, no.</p> <p>22 Q. Okay. Were you surprised when you got a call</p> <p>23 from Mr. Pattis to be the corporate representative in</p> <p>24 this case?</p> <p>25 A. I wouldn't say I was surprised. I knew he had</p>
<p>19</p> <p>1 and ready to go last week --</p> <p>2 A. No.</p> <p>3 Q. -- and it was given to us today?</p> <p>4 A. That's not what I said.</p> <p>5 Q. Okay. When did you review that?</p> <p>6 A. This particular packet (indicating)?</p> <p>7 Q. Yes.</p> <p>8 A. It was emailed to me this morning.</p> <p>9 Q. Okay.</p> <p>10 A. But the materials in here had been started to</p> <p>11 be put together -- sometime last week we started to put</p> <p>12 it together.</p> <p>13 Q. How do you know that?</p> <p>14 A. Because I looked at some of the Fontaine</p> <p>15 production.</p> <p>16 Q. Okay. Which parts of the Fontaine production</p> <p>17 were you able to see last week?</p> <p>18 A. So on our Dropbox that I believe I did mention</p> <p>19 yesterday, I did see articles. I saw blog posts. I</p> <p>20 saw -- and social media posts on Twitter, Facebook. I</p> <p>21 saw -- not just news articles, but articles posted by</p> <p>22 people on the internet. I believe I saw our article.</p> <p>23 There wasn't -- there was maybe a couple hundred pages</p> <p>24 worth of material on that.</p> <p>25 Q. A couple hundred. Let's say 200.</p>	<p>21</p> <p>1 been working on the Mr. Jones case for a couple of</p> <p>2 years. So I wouldn't say I was surprised.</p> <p>3 Q. When you say working on, he's been litigating</p> <p>4 it?</p> <p>5 A. I believe he litigates the Connecticut cases.</p> <p>6 Q. Correct. So when he said, hey, I need you to</p> <p>7 go to Texas, did that surprise you?</p> <p>8 A. Not really.</p> <p>9 Q. Have you ever given a deposition prior to</p> <p>10 yesterday?</p> <p>11 A. No.</p> <p>12 Q. Have you ever served as a corporate</p> <p>13 representative?</p> <p>14 A. No.</p> <p>15 Q. Ever gone to a -- you know, have you ever gone</p> <p>16 through a civil jury trial?</p> <p>17 A. Have I gone through a jury trial? No.</p> <p>18 Q. Okay. So your background is in criminal law,</p> <p>19 correct?</p> <p>20 A. For the most part, yes.</p> <p>21 Q. So when a civil lawyer calls you and says, I'd</p> <p>22 like for you to be the corporate representative in these</p> <p>23 civil matters, things you've never done before, you</p> <p>24 weren't at all surprised?</p> <p>25 A. Well, Norm is not only a civil lawyer. But...</p>

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<p style="text-align: right;">22</p> <p>1 No. I wasn't very surprised.</p> <p>2 Q. I didn't say Norm was only a civil lawyer.</p> <p>3 A. You said when a civil lawyer calls you. So</p> <p>4 he's not just a civil lawyer.</p> <p>5 Q. True or false, Norm's a civil lawyer?</p> <p>6 A. He practices civil and criminal.</p> <p>7 Q. There we go.</p> <p>8 So the answer to my question would be yes,</p> <p>9 and I don't need all the extra.</p> <p>10 You understand that, right?</p> <p>11 A. Sure.</p> <p>12 Q. Right. Because I sat through yesterday. And,</p> <p>13 unfortunately, Mr. Bankston is far more patient than I'm</p> <p>14 gonna be. Okay? I'm just putting it out there.</p> <p>15 If I ask a question, answer the one that's</p> <p>16 on the table.</p> <p>17 You're a lawyer. You know what to do,</p> <p>18 right? Or do you?</p> <p>19 A. Is there -- is there an actual question there?</p> <p>20 Q. Yes. Do you know what to do when someone asks</p> <p>21 you a question --</p> <p>22 A. Yes.</p> <p>23 Q. -- in a deposition?</p> <p>24 Okay. Well, then, based on what just</p> <p>25 happened there, let me tell you that when I'm asking a</p>	<p style="text-align: right;">24</p> <p>1 A. Yes.</p> <p>2 Q. How long did y'all talk?</p> <p>3 A. A couple of hours. I think probably about two</p> <p>4 hours.</p> <p>5 Q. Okay. That was on the phone?</p> <p>6 A. No. I spoke to him in person.</p> <p>7 Q. Where?</p> <p>8 A. At the office.</p> <p>9 Q. Whose office?</p> <p>10 A. The company's office.</p> <p>11 Q. In Austin?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. When was that?</p> <p>14 A. Saturday.</p> <p>15 Q. Okay. Who else?</p> <p>16 You said you spoke with Mr. Daniels and</p> <p>17 other employees earlier.</p> <p>18 Who else did you talk to?</p> <p>19 A. In connection with just the Fontaine case?</p> <p>20 Q. Yes, ma'am.</p> <p>21 A. I spoke to Mr. Jones; I spoke to Mr. Salazar; I</p> <p>22 spoke to -- I spoke to the attorneys.</p> <p>23 Q. You said that plurally.</p> <p>24 Who are the attorneys?</p> <p>25 A. I spoke to Attorney Blott; I spoke to Attorney</p>
<p style="text-align: right;">23</p> <p>1 question in a deposition, let me finish, and then answer</p> <p>2 so that Ms. -- the court reporter right here can get</p> <p>3 down a clear record. Okay?</p> <p>4 A. Sure.</p> <p>5 Q. Giving you another heads up. Because when you</p> <p>6 said yes you know what you're doing, you're actually</p> <p>7 kind of violating a different rule.</p> <p>8 When it came to your \$30,000 flat rate,</p> <p>9 how much were you estimating per hour?</p> <p>10 A. I don't know if it actually works out to be</p> <p>11 that. But, usually, my hourly rate was around \$350.</p> <p>12 But given the amount of time, I doubt it's calculated</p> <p>13 out to be that much.</p> <p>14 Q. Sure. I was asking how you came to that</p> <p>15 number, \$30,000.</p> <p>16 It's a specific number, correct?</p> <p>17 A. Sure. It's a specific number.</p> <p>18 Q. Okay. So if you estimated, I guess, what, 86</p> <p>19 hours of work times 350 would get us there, correct?</p> <p>20 A. That's probably what it breaks down to; but,</p> <p>21 ultimately, it required more.</p> <p>22 Q. Right. Are you gonna charge more?</p> <p>23 A. No.</p> <p>24 Q. Okay. Who'd you -- you mentioned that you</p> <p>25 talked with Mr. Daniels in preparation for today, right?</p>	<p style="text-align: right;">25</p> <p>1 Pattis.</p> <p>2 Q. Okay. What was Mr. Pattis's role in all of</p> <p>3 this?</p> <p>4 A. I just -- generally, we're talking about the</p> <p>5 depositions and the information that I needed and</p> <p>6 required.</p> <p>7 Q. What'd y'all talk about?</p> <p>8 A. I -- I think that's privileged.</p> <p>9 Q. I didn't ask you if you think it's privileged.</p> <p>10 If it's privileged, Ms. Blott will object and instruct</p> <p>11 you.</p> <p>12 But Mr. Pattis isn't an attorney of record</p> <p>13 here. He's not an employee of Infowars and you, in your</p> <p>14 capacity, weren't acting as a lawyer.</p> <p>15 So I'm gonna ask you again: What did you</p> <p>16 and Mr. Pattis talk about?</p> <p>17 MS. BLOTT: I'm gonna object to</p> <p>18 attorney-client privilege.</p> <p>19 A. I think Attorney Pattis is an attorney for the</p> <p>20 company, maybe not in this particular case, but he is an</p> <p>21 attorney for the company.</p> <p>22 Q. (By Mr. Ogden) And Mr. Pattis was in Austin?</p> <p>23 A. No. He's not in Austin.</p> <p>24 Q. You said you spoke to him on this case.</p> <p>25 So he's not -- you didn't speak to him</p>

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<p style="text-align: right;">26</p> <p>1 here?</p> <p>2 A. In person? No. I spoke to him on the phone.</p> <p>3 Q. Okay. And was Mr. Pattis giving legal advice?</p> <p>4 A. About this particular case?</p> <p>5 Q. Yes.</p> <p>6 A. I believe so, yes.</p> <p>7 Q. Okay.</p> <p>8 MR. OGDEN: I'm just gonna leave that</p> <p>9 there.</p> <p>10 MR. BANKSTON: Yeah.</p> <p>11 Q. (By Mr. Ogden) You understand that if</p> <p>12 practicing law in a state that you're not licensed is an</p> <p>13 ethical violation and, in most states, criminal.</p> <p>14 Do you understand that?</p> <p>15 A. I'm not here to testify as to that.</p> <p>16 Q. I just asked you if you understood that.</p> <p>17 A. I don't understand that.</p> <p>18 Q. Okay. Mr. Jones, Mr. Daniels, Mr. Salazar,</p> <p>19 Ms. Blott, and Mr. Pattis.</p> <p>20 Anybody else you spoke to on this case?</p> <p>21 A. I don't believe so.</p> <p>22 Q. Do you feel, sitting here right now, that you</p> <p>23 are adequately prepared to discuss the topics that were</p> <p>24 in the deposition notice?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">28</p> <p>1 I'm not from Austin; did you know that?</p> <p>2 A. No, I don't.</p> <p>3 Q. Okay. I know you need to get back home, too,</p> <p>4 right?</p> <p>5 A. Sir, do you have a question for me?</p> <p>6 Q. Right.</p> <p>7 You -- you have a flight booked this</p> <p>8 afternoon, correct?</p> <p>9 A. Yes, I do.</p> <p>10 Q. Okay. And it leaves at 4:00, right?</p> <p>11 A. No, it doesn't.</p> <p>12 Q. Okay. Then you need to leave here by 4:00?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And I'd like to get us both out of here.</p> <p>15 Truly, I don't want to be here any longer than I can be.</p> <p>16 But when you start randomly injecting</p> <p>17 information into questions that aren't asked, do you</p> <p>18 understand that that's going to make this a much longer</p> <p>19 process?</p> <p>20 A. Sir, can you pose me a question.</p> <p>21 Q. I asked you: Do you understand that?</p> <p>22 A. I understand what your point is.</p> <p>23 Can you please pose me a question.</p> <p>24 Q. Sure. How old are you?</p> <p>25 A. I'm 35.</p>
<p style="text-align: right;">27</p> <p>1 Q. Did you think walking into yesterday that you</p> <p>2 were prepared?</p> <p>3 A. As much as I could be, yes.</p> <p>4 Q. I didn't ask as much as you could be. I asked</p> <p>5 if you were prepared, fully prepared.</p> <p>6 A. Like I said, as much as I could be, yes. I</p> <p>7 don't think there was anybody who could have testified</p> <p>8 any better as to those topics.</p> <p>9 Q. Okay. Did I ask that?</p> <p>10 A. No.</p> <p>11 Q. Did I ask you if you thought there was anyone</p> <p>12 else that could be better prepared?</p> <p>13 A. No.</p> <p>14 Q. Okay. Why'd you say it?</p> <p>15 A. Because it's true.</p> <p>16 Q. Right. But I like hot dogs is true, but I'm</p> <p>17 not gonna blurt it out randomly in a deposition.</p> <p>18 A. It wasn't random.</p> <p>19 Q. It wasn't, which is why I'm asking you why you</p> <p>20 said it.</p> <p>21 A. And I just told you.</p> <p>22 Q. Cause it's true?</p> <p>23 A. No. Because it's relevant to your question.</p> <p>24 Q. Okay. I truly want to get on the road back</p> <p>25 home today. You understand that?</p>	<p style="text-align: right;">29</p> <p>1 Q. Okay. Where'd you go to law school?</p> <p>2 A. Quinnipiac University School of Law.</p> <p>3 Q. You said, I believe, you're in your 10th year.</p> <p>4 A. Yes.</p> <p>5 Q. Where is your office?</p> <p>6 A. I have an office in Shelton, Connecticut.</p> <p>7 Q. Okay. How -- you -- earlier you said you had a</p> <p>8 professional relationship with Mr. Pattis.</p> <p>9 You used to work for him, correct?</p> <p>10 A. Yes.</p> <p>11 Q. How long?</p> <p>12 A. About five years.</p> <p>13 Q. Okay. And that was right out of law school?</p> <p>14 A. Yes.</p> <p>15 Q. What'd you work -- what kind of cases did you</p> <p>16 work with?</p> <p>17 A. Mostly criminal, but we did do some civil.</p> <p>18 Q. Did you handle any defamation cases?</p> <p>19 A. No.</p> <p>20 Q. All right. There is a number of individuals at</p> <p>21 the company that are -- that have been with the company</p> <p>22 for much longer than two weeks, correct?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Why do you think that you were the only</p> <p>25 person, as you stated earlier, that could have possibly</p>

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<p style="text-align: right;">30</p> <p>1 been prepared to testify on the subject matter of these 2 two depositions?</p> <p>3 A. Because I think that you have previously tried 4 to depose two other people. Those depositions, they 5 were not adequately able to testify as to the topics 6 that were presented. And I also think that perhaps they 7 didn't have either the time that was required to 8 dedicate to such an undertaking. And, third, that I 9 think that there is no one person that is in charge 10 with -- of this material at the company to testify as to 11 it.</p> <p>12 Q. What did you do to prepare to discuss the 13 company's policies regarding the factual vetting of 14 information that Infowars disseminates?</p> <p>15 A. Sure. So I've spoken to -- as we testified to 16 yesterday, I've spoken to a number of other people in 17 connection with the policies and procedures. So I spoke 18 to Melinda; I spoke to Daria; I spoke to Rob Dew; I 19 spoke to Alex Jones, a bunch of other people.</p> <p>20 And, generally speaking, as far as the 21 vetting procedures for sourcing and articles, the 22 company's position is that it does not engage in 23 journalism. So it requires the vetting be done by the 24 sources that it's citing.</p> <p>25 Q. I believe yesterday you said there are no --</p>	<p style="text-align: right;">32</p> <p>1 A. I did.</p> <p>2 Q. So you had spoken to him prior to you just 3 telling the jury that there are no written policies and 4 procedures, correct? Correct?</p> <p>5 A. May I just look at this for a second.</p> <p>6 Q. The question doesn't require you to know what's 7 in there.</p> <p>8 I'm just asking you if you spoke to Kit 9 Daniels before you just told the jury that there are no 10 written policies and procedures?</p> <p>11 A. I did speak to Kit Daniels.</p> <p>12 Q. Okay.</p> <p>13 A. And I have seen this --</p> <p>14 Q. Okay.</p> <p>15 A. -- in the connection with -- this is the 16 company handbook that was produced to me by --</p> <p>17 Q. There's no question.</p> <p>18 A. -- Melinda.</p> <p>19 Q. There's no question on the table. You're just 20 talking.</p> <p>21 A. The question was did I speak to Kit Daniels. 22 Yes, I did.</p> <p>23 Q. Okay. And I'll -- trust me, I will ask you 24 about Melinda, if I need to.</p> <p>25 The front page of Exhibit 1, can you read</p>
<p style="text-align: right;">31</p> <p>1 there are no policies at Infowars for fact checking, I 2 think is how it came out.</p> <p>3 Do you remember that?</p> <p>4 A. Right. There are no written policies. But, 5 generally speaking, as I said earlier and yesterday, the 6 company relies on the sources to do their fact checking.</p> <p>7 Q. Okay. And the sources were also -- let's back 8 up a little bit.</p> <p>9 Also, you said that Infowars doesn't 10 really have journal- -- and by Infowars, you understand 11 I mean Free Speech Systems and its --</p> <p>12 A. I understand.</p> <p>13 Q. You said that Infowars doesn't necessarily have 14 journalists; it's all punditry-type things.</p> <p>15 A. Right. Commentary, blogging, that type of 16 thing; that's right.</p> <p>17 MR. OGDEN: Let's mark Exhibit 1. 18 (Exhibit 1 marked.)</p> <p>19 Q. (By Mr. Ogden) Let's mark this as Exhibit 1, 20 now that you gave me that answer.</p> <p>21 Exhibit 1, can you read for the jury who 22 that's from?</p> <p>23 A. It appears to be from Kit Daniels.</p> <p>24 Q. Okay. And you spoke with Mr. Daniels preparing 25 for today?</p>	<p style="text-align: right;">33</p> <p>1 who that's to?</p> <p>2 A. It says Infowars staff.</p> <p>3 Q. Okay. And the subject line, can you read it 4 for me?</p> <p>5 A. It says, new editorial policy for all 6 reporters, journalists, and writers.</p> <p>7 Q. I swear -- so after reporters, what was that 8 word you said?</p> <p>9 A. It says journalists.</p> <p>10 Q. And you told us that you have seen this prior 11 to today, correct?</p> <p>12 A. This particular email (indicating)?</p> <p>13 Q. Exhibit 1.</p> <p>14 A. Well, Exhibit 1 is two things. So I want to 15 know what part of it you are asking about.</p> <p>16 Q. Did you see the first page before today?</p> <p>17 A. No.</p> <p>18 Q. Don't you think you probably should have?</p> <p>19 A. Sure.</p> <p>20 Q. Especially if you spoke to the person that 21 wrote it who implemented the policies, correct?</p> <p>22 A. I did speak to Kit Jones [sic]. So, yes.</p> <p>23 Q. Daniels, correct?</p> <p>24 A. Oh, yes. I'm sorry. I did say Jones.</p> <p>25 Q. Mr. Daniels, he withheld this information about</p>

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<p style="text-align: right;">34</p> <p>1 sending this out, a specific policy that was implemented 2 post the filing of these lawsuits? 3 A. I don't know that he withheld it. 4 Q. But you didn't know about it, right? 5 A. I didn't see this. No. 6 Q. All right. You wish you would have? 7 A. Sure. 8 Q. Because prior to me handing you that document, 9 you also told the jury that Infowars doesn't have 10 journalists, and that document appears Mr. Daniels, in a 11 supervisorial [sic] role, that -- is instructing 12 requirements for journalists, right? 13 A. As I testified earlier, it's the company's 14 position that we're not engaged, generally, in 15 journalism. 16 Q. Was not my question. 17 My question was, Mr. Daniels is writing 18 that to researchers and journalists? 19 A. It doesn't say researchers; it says reporters. 20 Q. Excuse me. You're right. 21 Reporters and journalists. 22 A. That's what it says. 23 Q. Okay. And the keyword there is journalist, and 24 that's what I want to focus on. 25 Because you would agree that prior to me</p>	<p style="text-align: right;">36</p> <p>1 Q. You think you're more qualified than which one, 2 which person that I named? 3 A. Well, first of all, I don't want to ad- -- not 4 just advocate, but I don't want to say that I agree with 5 what you're saying, that these people have said these 6 things in the past. 7 But I'm here to testify on the behalf of 8 the company, not individual people and what individual 9 people may think about themselves and what they do. 10 Q. Okay. 11 A. The company's position is that 98 percent of 12 what we do is commentary on things that have already 13 been in the news cycle. 14 Q. I heard you say that 98 percent yesterday. 15 A. Yes. 16 Q. Very specific number. 17 Where'd you get it? 18 A. That's based on my conversations with Mr. Jones 19 and the other employees that -- vast, vast majority of 20 what they do is, like I said yesterday, the production 21 process of looking through the news cycle and what is -- 22 what other sources are saying and commenting on those 23 particular sources. 24 There are a small percentage of things 25 that would probably be considered independent, such as</p>
<p style="text-align: right;">35</p> <p>1 handing you that document, you were going to have this 2 jury believe that Infowars doesn't have journalists. 3 A. It's the company's position that we're not 4 engaged in journalism. 5 Q. Wasn't my question. 6 I asked if you were -- prior to that 7 document being handed to you, your testimony would lead 8 this jury to believe that Infowars doesn't have 9 journalists? 10 A. Yes. That's the company's position. 11 Q. Okay. When did that change? 12 A. What -- what do you mean, when did that change? 13 Q. Well, you had Mr. Jones three times, 14 Mr. Shroyer, Mr. Dew twice, Ms. Karpova at least once, 15 and that document, in front of you, all stating that 16 Infowars does journalism and has journalists. 17 So I'm asking you: When did the policy 18 change to where they no longer have journalists and 19 don't do journalism? 20 A. I don't think it's changed. 21 Q. Okay. You would agree with me that every 22 single person I listed before you in that last question 23 is more qualified to tell us what Infowars does, 24 correct? 25 A. No.</p>	<p style="text-align: right;">37</p> <p>1 the few articles Mr. Salazar did, as an example. But 2 that is not the norm or what the company is engaged in 3 for the vast majority of it. 4 Q. Okay. And I know that we have to say the 5 company -- 6 A. Yes. 7 Q. -- because there's a legal vacuum of LLCs. 8 Who owns the company? 9 A. Who owns Free Speech? 10 Q. Who owns Free Speech and Infowars, LLC? 11 A. I believe Mr. Jones owns Free Speech. 12 Q. Right. And -- and you understood earlier when 13 I said Mr. Jones has been in a deposition chair, raised 14 his right hand, and swore to God to tell the whole truth 15 three times before you sat here, correct? 16 A. I know he's given three depositions, yes. 17 Q. And Mr. Jones also started these companies, 18 right? 19 A. Yes, he did. 20 Q. And you're sitting here today saying your 21 testimony is the company's position, but Mr. Jones 22 testifying on the company as the owner and inventor of 23 these companies, we -- we should discount that? 24 A. I'm saying I don't recall what you're referring 25 to in his depositions. But, like I'm saying, after my</p>

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<p>38</p> <p>1 conversations with Mr. Jones and others, as I've already 2 testified, that is the company's position. 3 Q. Do political commentary, people that do 4 political commentary, do they have a duty to tell their 5 audiences the truth? 6 A. I think that what we are offering are opinions. 7 Q. Didn't ask what you're offering. Didn't even 8 get close to that question. 9 A. Yeah. You said I'm offering political comment. 10 Q. If you listen carefully, I'll ask it again. 11 A. Sure. 12 Q. Do individuals that do political commentary -- 13 A. Uh-huh. 14 Q. -- owe a duty to their viewers to be truthful? 15 A. And here's what my problem with the question 16 is. When you're saying truthful, something is truthful 17 if it's capable of being true or false. An opinion is 18 an opinion and capable of being proven true or false. 19 So that's why I'm having a problem with your question. 20 Q. Okay. The things that a political commentator 21 say that can be proven true or false -- 22 A. Uh-huh. 23 Q. -- does that individual have a duty to its 24 viewers to be truthful in those positions? 25 A. So I think that the company's position has been</p>	<p>40</p> <p>1 interviews right? 2 A. As I said, Mr. Jones has his own opinions, and 3 this is something that you'd probably have to ask him. 4 Q. Right. We did. He doesn't think in any way 5 your 98 percent is accurate on any planet. 6 A. I don't think that that's accurate, based on my 7 conversations with him. 8 Q. Okay. That's why I asked did you ask when it 9 changed. 10 Because you read his deposition, right? 11 A. I didn't read all of them. I think my 12 testimony was I didn't read them all. 13 Q. Why didn't you read them all? 14 A. Just time constraints. 15 Q. Is that the only reason? 16 A. Yes. 17 Q. Okay. The depositions that you did read, who 18 gave those to you? 19 A. They were provided to me on our Dropbox. So it 20 was the materials that were produced in connection with 21 these cases, the Texas cases. 22 Q. Who created that Dropbox? 23 A. You -- you know what, I'm not a hundred percent 24 sure. We do have a -- at one time did have a consultant 25 that we worked with to try to put information on the</p>
<p>39</p> <p>1 that they do strive to put forth truthful information. 2 So... 3 Q. I didn't ask that. 4 A. And -- but as far as a duty owed to the 5 viewership or whoever's listening to the broadcasts, I 6 think what the company puts forth are the source 7 materials and tells the -- tells the audience where they 8 can go find this information and then that source has a 9 duty to be truthful. 10 MS. BLOTT: Listen to the question. 11 Q. (By Mr. Ogden) You've watched a number of hours 12 of Infowars, I'm sure, over the past two weeks. 13 A. Yes. 14 Q. Okay. Surely, you've heard Mr. Jones on one of 15 his shows numerous times say his -- kind of a motto that 16 he does when he's signing off that says, we're the truth 17 in journalism. 18 Surely, you've heard that if you've 19 watched a hundred hours. 20 A. I -- I do recall him saying something to that 21 effect. 22 Q. What do you think he meant? 23 A. I don't know. 24 Q. Surely, if you're gonna sit here and say that 25 98 percent isn't journalism, you'd ask him in one of the</p>	<p>41</p> <p>1 Dropbox and organize it and try to help us find 2 material, but I don't -- I don't know anything other 3 than that. 4 Q. A third -- not an Infowars person? 5 A. No. He's not a -- 6 Q. A third party? 7 A. A third party. 8 Q. Surely, he signed the protective order, right? 9 A. I don't know the answer to that. 10 Q. You didn't sign a protective order? 11 A. No, I didn't. 12 Q. And you're not an employee of Infowars? 13 A. No, I'm not. 14 Q. Or Free Speech Systems? 15 A. No. 16 Q. Okay. I want to get back to this 98 percent, 17 because you've said it twice under oath, and it seems 18 like you base that number on all of the research and 19 preparation you did for the two depositions yesterday 20 and today, correct? 21 A. Yes. 22 Q. What'd you use? Some sort of algorithm or 23 matrix to get to that number? 24 A. No. 25 Q. Why didn't you settle for a whole number, like</p>

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<p style="text-align: right;">42</p> <p>1 95 or 99, 97? How'd you get to that 98?</p> <p>2 A. That wasn't my number. I think that was a</p> <p>3 number that Mr. Jones had said that in his estimation</p> <p>4 that's what he thought we did as a company.</p> <p>5 Q. Okay. So Mr. Jones is now the position --</p> <p>6 based on the company, the company's position is that</p> <p>7 Mr. Jones believes that 98 percent of what he does on</p> <p>8 air is not journalism, correct?</p> <p>9 A. I think the company's position is that, not</p> <p>10 Mr. Jones.</p> <p>11 Q. Right.</p> <p>12 A. But, yes.</p> <p>13 Q. But the company is basing that opinion on an</p> <p>14 interview it did with Mr. Jones, right?</p> <p>15 A. It's not just that interview, no.</p> <p>16 Q. Okay. What else is it?</p> <p>17 A. It was based on my interviews with the other</p> <p>18 employees, as to the purpose and types of material that</p> <p>19 are put on to the air on a daily basis, and how they do</p> <p>20 their production, and what the purpose of those</p> <p>21 productions are. So I think that it's based on</p> <p>22 confirmatory interviews that I did with other people,</p> <p>23 not just with Mr. Jones.</p> <p>24 Q. Okay. Mr. Jones, did -- did he give you a</p> <p>25 percentage?</p>	<p style="text-align: right;">44</p> <p>1 research; I've seen the data, and this is my conclusion,</p> <p>2 what is that?</p> <p>3 A. It's an opinion.</p> <p>4 Q. What if they don't say opinion? What if they</p> <p>5 say, based on the evidence, this is a fact?</p> <p>6 A. I don't think that's what he said. That's</p> <p>7 not -- that's not what he said.</p> <p>8 Q. Who and when?</p> <p>9 A. I think you're referring to Mr. Jones'</p> <p>10 statement that I've done the deep research, and I think</p> <p>11 this, et cetera.</p> <p>12 Q. No.</p> <p>13 A. He doesn't -- he did not say it the way you</p> <p>14 said it.</p> <p>15 Q. I'm not saying he did. I'm not talking about</p> <p>16 that.</p> <p>17 A. Okay.</p> <p>18 Q. I'm saying if a personality like David</p> <p>19 Knight --</p> <p>20 A. Okay.</p> <p>21 Q. -- or Owen Shroyer -- Owen Shroyer,</p> <p>22 specifically, we'll focus on him -- says I've done the</p> <p>23 research, and this is a fact.</p> <p>24 If that comes out of someone's mouth at</p> <p>25 Infowars, there's a duty that it should be truthful,</p>
<p style="text-align: right;">43</p> <p>1 A. I believe that that percentage came from</p> <p>2 Mr. Jones, based on our conversation. But, like I said,</p> <p>3 it was confirmed by my other conversations with people.</p> <p>4 Q. Okay. So other people in the company also are</p> <p>5 saying 98 percent?</p> <p>6 A. I don't think they used that number. But their</p> <p>7 position to me was that the process is and generally</p> <p>8 what they're engaged in is commentary on what is in the</p> <p>9 news cycle and the process by which that happens on a</p> <p>10 daily basis.</p> <p>11 Q. If I ran a business and 98 percent of it was</p> <p>12 baking cakes and 2 percent of it was doing brain</p> <p>13 surgery, you would expect that I would be extremely</p> <p>14 qualified and adhered to the standards for 2 percent of</p> <p>15 brain surgery that I do, correct?</p> <p>16 A. I don't know how to answer that.</p> <p>17 Q. Well, let me ask you this: Because 2 percent</p> <p>18 is journalism --</p> <p>19 A. Uh-huh.</p> <p>20 Q. -- would you agree that Infowars has a duty to</p> <p>21 make sure that what they report is true?</p> <p>22 A. For the -- for the articles or whatever that</p> <p>23 are independent reporting, sure.</p> <p>24 Q. Okay. And when Mr. Jones or any other</p> <p>25 personality goes on air and says, I've done the</p>	<p style="text-align: right;">45</p> <p>1 right?</p> <p>2 A. I'm sorry. I don't know which statement you're</p> <p>3 referring to.</p> <p>4 Are you representing that Owen did, in</p> <p>5 fact, say that?</p> <p>6 Q. Did you --</p> <p>7 A. Or are you saying -- is that a hypothetical</p> <p>8 question?</p> <p>9 I want to make sure I understand.</p> <p>10 Q. Well, I'll say it's a hypothetical right now.</p> <p>11 A. Okay. If it's a hypothetical and someone is</p> <p>12 the original source saying this is a fact and I -- this</p> <p>13 is -- and putting something forth as a fact, then I</p> <p>14 think there's a different standard, yes.</p> <p>15 Q. What do you mean -- what do you mean when you</p> <p>16 use the term source?</p> <p>17 A. What I mean is, is that someone has done</p> <p>18 vetting of a particular piece of information.</p> <p>19 Q. Okay. So when someone's talking about the</p> <p>20 vetting they've done on a piece of information, that's a</p> <p>21 source?</p> <p>22 A. Right.</p> <p>23 Q. So if Infowars is talking about the -- the</p> <p>24 research and the review of data that they've done, and</p> <p>25 then they come out with a conclusion at the end of that,</p>

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<p style="text-align: right;">46</p> <p>1 that they would be the source?</p> <p>2 A. No.</p> <p>3 Q. How is that different?</p> <p>4 A. Because when the research that they're</p> <p>5 referring to are other articles that have cited their</p> <p>6 own source and have done their own sourcing and their</p> <p>7 own vetting, that is not -- that is not -- they are --</p> <p>8 they are not the source.</p> <p>9 Q. Right.</p> <p>10 A. The person that the information came from is</p> <p>11 the source.</p> <p>12 Q. Right. But when someone from Infowars takes an</p> <p>13 independent article and then says, I read this; I've</p> <p>14 done the research; I've seen this stuff, and this is my</p> <p>15 conclusion.</p> <p>16 A. I don't think that's the context of the</p> <p>17 statement. I think the context is, is I've read this</p> <p>18 source, this is what I'm basing my opinion on, and</p> <p>19 here's my opinion.</p> <p>20 Q. Oh. So they definitely used the word opinion?</p> <p>21 A. I don't think they definitely used the word</p> <p>22 opinion, but it was presented as an opinion.</p> <p>23 Q. How do the viewers of Infowars know when it's</p> <p>24 opinion or when it's fact?</p> <p>25 MS. BLOTT: Objection; calls for</p>	<p style="text-align: right;">48</p> <p>1 Q. And you saw the lists?</p> <p>2 A. Did I see the lists for each host? No. I did</p> <p>3 talk to Daria about what Alex's current list is. But</p> <p>4 aside from that, I -- I did not do any research for</p> <p>5 other hosts.</p> <p>6 Q. What's on Mr. Jones' current list?</p> <p>7 A. I don't know if this is an exhaustive list, but</p> <p>8 I know that he looks at Drudge Report. He looks at what</p> <p>9 is trending on Twitter. He looks at Zero Hedge. And</p> <p>10 there may be two -- two or three others that I'm</p> <p>11 missing. But there's -- there's a list of five or six</p> <p>12 different sources.</p> <p>13 Q. Okay. Is 4chan on there?</p> <p>14 A. No.</p> <p>15 Q. Why not?</p> <p>16 A. I don't think that he does his sourcing from</p> <p>17 4chan.</p> <p>18 Q. Does anyone use 4chan to -- for sourcing?</p> <p>19 A. I don't think that sourcing is the right word.</p> <p>20 But I do know that based on my conversations, that</p> <p>21 certain of the reports -- writers, probably a better</p> <p>22 word, uses that for tips. But I wouldn't say that it</p> <p>23 was used -- it's used for sourcing.</p> <p>24 Q. Okay. When you say sourcing, are you -- is</p> <p>25 there an implication that sourcing is reliable?</p>
<p style="text-align: right;">47</p> <p>1 speculation.</p> <p>2 A. I don't know how to answer that.</p> <p>3 MR. OGDEN: If you want to restrict those</p> <p>4 to form and adhere to the Texas rules, I'd appreciate</p> <p>5 it.</p> <p>6 Q. (By Mr. Ogden) Can you repeat your answer,</p> <p>7 please.</p> <p>8 A. I said I don't really know how to answer that.</p> <p>9 I don't know what somebody else is going -- is going to</p> <p>10 think.</p> <p>11 Q. Okay. If a source is used at Infowars, who</p> <p>12 determines whether or not they're trustworthy?</p> <p>13 A. So I believe this is a conversation we had</p> <p>14 yesterday, too.</p> <p>15 But -- so preproduction, there is a list</p> <p>16 of sources. Each host has their own list that they --</p> <p>17 of preferred sources that they like to go -- that they</p> <p>18 like to go to. That source is -- it changes over time</p> <p>19 based on my conversations with -- for example, Nikko,</p> <p>20 Alex's list now is not Alex's list from when Nikko</p> <p>21 worked with him.</p> <p>22 But, basically, these are sources that the</p> <p>23 host prefers and has found to be reliable in the past</p> <p>24 and so would then trust -- trust where the articles are</p> <p>25 coming from. Excuse me.</p>	<p style="text-align: right;">49</p> <p>1 A. I'm sorry. I don't understand the question.</p> <p>2 Can you rephrase it.</p> <p>3 Q. Something you use as a source is reliable.</p> <p>4 Something you use for a tip is just kind of -- is what</p> <p>5 it is and you need to go verify it?</p> <p>6 A. Yes. That would be a fair -- fair assessment.</p> <p>7 Q. Okay. Now that you've seen Exhibit 1 --</p> <p>8 A. Uh-huh.</p> <p>9 Q. -- you understand it's from Kit Daniels?</p> <p>10 A. I understand it looks like an email from Kit</p> <p>11 Daniels, yes.</p> <p>12 Q. And yesterday you testified he's one of the</p> <p>13 supervisor roles at the company, correct?</p> <p>14 A. Yes. I think he started in that capacity</p> <p>15 sometime in 2018.</p> <p>16 Q. Why would he be sending that out to all</p> <p>17 journalists, among other people, if Infowars doesn't</p> <p>18 have any?</p> <p>19 A. I don't know why he used these specific terms.</p> <p>20 I do know that after the litigation, there had been some</p> <p>21 efforts made to try to put forth some standards,</p> <p>22 policies, and procedures that weren't in place</p> <p>23 previously.</p> <p>24 Q. Did Infowars -- in the Fontaine case, did</p> <p>25 Infowars do anything wrong?</p>

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<p>50</p> <p>1 A. In the Fontaine case specifically?</p> <p>2 Q. Correct.</p> <p>3 A. I think that in the Fontaine case, there was a</p> <p>4 breaking news story; that Mr. Daniels saw a photo</p> <p>5 circulating on social media. He had seen that photo in</p> <p>6 a couple of different locations, and he posted an</p> <p>7 article the same day -- it was late in the afternoon --</p> <p>8 and then left for the day. Saw that it was inaccurate</p> <p>9 and immediately took it down the next day.</p> <p>10 Q. The answer to my question is?</p> <p>11 A. No.</p> <p>12 Q. No, Infowars didn't do anything wrong?</p> <p>13 A. No.</p> <p>14 Q. Okay. In the Sandy Hook coverage, did Infowars</p> <p>15 do anything wrong?</p> <p>16 A. Can you be more specific.</p> <p>17 Q. No. Do you think in any way Infowars did</p> <p>18 anything wrong in the Sandy Hook case?</p> <p>19 A. I don't know how to answer that just because I</p> <p>20 don't know what you're referring to.</p> <p>21 Q. Okay. Their coverage, was any of it wrong or</p> <p>22 inaccurate?</p> <p>23 A. I think that most of the Sandy Hook coverage</p> <p>24 was opinion statements that -- that the hosts are</p> <p>25 entitle- -- and writers are entitled to have opinions.</p>	<p>52</p> <p>1 Q. Okay. So based on that answer, you -- we can</p> <p>2 agree on something, finally, which is the way that these</p> <p>3 different departments were being supervised was</p> <p>4 inappropriate?</p> <p>5 A. I just think it was not organized well, for --</p> <p>6 for a company.</p> <p>7 Q. Well, you used the term -- you said they were</p> <p>8 not managed appropriately.</p> <p>9 And then I inferred from that, that we can</p> <p>10 agree that they were managed inappropriately, correct?</p> <p>11 A. I think they could have been managed better.</p> <p>12 Q. Right. Wasn't my question.</p> <p>13 But --</p> <p>14 A. I wouldn't use the term inappropriate.</p> <p>15 Q. Okay. Then I'll use it the way that you used</p> <p>16 it in your answer.</p> <p>17 We can agree that Infowars was managed --</p> <p>18 the way that Infowars was managed was not appropriate --</p> <p>19 A. It --</p> <p>20 Q. -- correct?</p> <p>21 A. Correct. It could have been done better.</p> <p>22 Q. Okay. Can I see that real quick.</p> <p>23 A. This?</p> <p>24 Q. Yeah. I only have one copy. But...</p> <p>25 (Mr. Ogden reviewing document.)</p>
<p>51</p> <p>1 Q. Okay. Was any of it wrong?</p> <p>2 A. Wrong factually?</p> <p>3 Q. Correct.</p> <p>4 A. Which part?</p> <p>5 Q. Any of it.</p> <p>6 A. I don't know what you're specifically referring</p> <p>7 to.</p> <p>8 Q. Well, I'm trying to figure out why after the</p> <p>9 litigation started that one of the supervisors at</p> <p>10 Infowars decided to put a policy in place to protect the</p> <p>11 company, if the company's position is it didn't do</p> <p>12 anything wrong?</p> <p>13 A. I didn't testify it was to protect the company.</p> <p>14 Q. Okay. Why would he put that in place?</p> <p>15 A. Because I think that it came to the attention</p> <p>16 of the company that it was growing, it was -- there were</p> <p>17 a lot of different people involved, different</p> <p>18 departments, and that it wasn't being managed or</p> <p>19 supervised in an appropriate way, and they wanted to</p> <p>20 make certain policies clearer going forward.</p> <p>21 All of these things, like I testified</p> <p>22 yesterday, there were departments that nobody was</p> <p>23 talking to anybody, there was really no overall</p> <p>24 hierarchical structure. So after the lawsuits, there</p> <p>25 were efforts made to rectify that.</p>	<p>53</p> <p>1 Q. (By Mr. Ogden) That policy, would you agree,</p> <p>2 was made to protect the company?</p> <p>3 A. Which policy? The one in this -- in -- in the</p> <p>4 email.</p> <p>5 Q. Right. The email that has the attachment</p> <p>6 behind it.</p> <p>7 A. Well, the attachment is not the same thing as</p> <p>8 what is being cited in the email.</p> <p>9 Q. Okay.</p> <p>10 A. So that's why I wanted to know which policy.</p> <p>11 Q. I'm focused on the policy in the body of the</p> <p>12 email.</p> <p>13 A. Okay. So this policy in the body of the</p> <p>14 emailing regarding possibility of crimes being</p> <p>15 committed, that's the one you're talking about?</p> <p>16 Q. (Nodding.)</p> <p>17 A. Okay. What was your question?</p> <p>18 Q. It's made to protect the company?</p> <p>19 A. I think it was made to give guidance on how to</p> <p>20 write articles in the -- in the future.</p> <p>21 Q. Why was it giving guidance to write articles in</p> <p>22 the future?</p> <p>23 A. Because there was no -- there was no guidance</p> <p>24 previously.</p> <p>25 Q. Okay. And the reason we're giving guidance is</p>

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<p>54</p> <p>1 to protect the company, correct?</p> <p>2 I'm not sure why we're fighting on this.</p> <p>3 It helps you.</p> <p>4 A. I don't know why it would -- I mean, sure it</p> <p>5 helps the company. So there could be -- obviate any</p> <p>6 potential future lawsuits. So, sure, it could help the</p> <p>7 company.</p> <p>8 Q. Okay.</p> <p>9 A. It could be for other things. I don't know if</p> <p>10 the purpose of it was that. But...</p> <p>11 Q. The -- it mentions in there that any story</p> <p>12 involving even the potential for criminal liability</p> <p>13 needs to be vetted by multiple, in all caps, editors,</p> <p>14 correct?</p> <p>15 MS. BLOTT: I'm gonna object to the extent</p> <p>16 that it mischaracterized the content.</p> <p>17 MR. OGDEN: Ms. Blott -- Ms. Blott, I'm</p> <p>18 gonna ask you one more time. If you don't follow the</p> <p>19 Texas rules -- and you can object to form or the other</p> <p>20 two permissible objections.</p> <p>21 MS. BLOTT: Objection; form.</p> <p>22 MR. OGDEN: Thank you. I'll ask if I need</p> <p>23 clarification to cure it.</p> <p>24 I mean, I'm not trying to be rude at all,</p> <p>25 but I'm having a hard enough time getting your witness</p>	<p>56</p> <p>1 case was Bates stamped?</p> <p>2 A. I don't think the only material I reviewed was</p> <p>3 Bates stamped. The depositions are not Bates stamped.</p> <p>4 Q. Did you review any other documents that weren't</p> <p>5 Bates stamped preparing for yesterday or today?</p> <p>6 A. The depositions, as I said, were not Bates</p> <p>7 stamped. I don't believe the petitions were Bates</p> <p>8 stamped.</p> <p>9 Q. How many documents did you get through out of</p> <p>10 the 81,290- --</p> <p>11 A. Thousands of documents.</p> <p>12 Q. Let me finish my question, please.</p> <p>13 Of the 81,297 documents, how many did you</p> <p>14 get through?</p> <p>15 A. Thousands.</p> <p>16 Q. How many thousands?</p> <p>17 A. I don't know how many thousands.</p> <p>18 Q. Tens of thousands? Fives of thousands?</p> <p>19 A. Probably 10s of thousands.</p> <p>20 Q. Okay. Did you get about half, maybe?</p> <p>21 A. I'm sorry?</p> <p>22 Q. Halfway?</p> <p>23 A. Halfway through what?</p> <p>24 Q. Did you get to 40,596 documents through?</p> <p>25 That's half of the document production.</p>
<p>55</p> <p>1 to answer my questions, and if I have a bunch of</p> <p>2 speaking objections for you, that's just gonna -- I -- I</p> <p>3 don't think that we're gonna be able to do this. We may</p> <p>4 have to get the judge on the phone. Okay?</p> <p>5 (Ms. Blott looking at Mr. Ogden.)</p> <p>6 A. I'm sorry. What was your question?</p> <p>7 Q. (By Mr. Ogden) My question was, that it</p> <p>8 needs -- that articles need to be checked by multiple,</p> <p>9 in all caps, editors, correct?</p> <p>10 A. That's what it says.</p> <p>11 Q. Why would something need to be checked by</p> <p>12 multiple editors?</p> <p>13 A. I don't know.</p> <p>14 Q. Prior to today, you had never seen that email?</p> <p>15 A. No. I've never seen this email.</p> <p>16 MR. OGDEN: Right.</p> <p>17 Q. (By Mr. Ogden) And so whenever I asked you</p> <p>18 about Topic 1 in your deposition notice, which were the</p> <p>19 policies regarding the factual vetting of information,</p> <p>20 nobody even gave you this piece -- this document to</p> <p>21 prepare, true?</p> <p>22 A. No. This -- this doesn't have a Bates stamp on</p> <p>23 it, so it wouldn't have been included in the -- in the</p> <p>24 material that I was provided.</p> <p>25 Q. So the only thing that you reviewed for this</p>	<p>57</p> <p>1 A. I don't know. I don't know the exact number.</p> <p>2 Q. And probably because you don't is because -- I</p> <p>3 don't know -- 22,000 of those documents were produced by</p> <p>4 Infowars without Bates stamps.</p> <p>5 Did you know that?</p> <p>6 A. I know that there has been an issue with the</p> <p>7 organization of the production materials.</p> <p>8 Q. So surely you weren't shocked when you said</p> <p>9 that you didn't review -- you've never seen this, but it</p> <p>10 doesn't have a Bates stamp, right? Because you saw a</p> <p>11 number of documents that were produced in this</p> <p>12 litigation that didn't have those, right?</p> <p>13 A. Did I see documents without Bates stamps; is</p> <p>14 that your question?</p> <p>15 Q. Correct.</p> <p>16 A. I didn't see documents like this without Bates</p> <p>17 stamps.</p> <p>18 Q. What do you mean like this?</p> <p>19 A. This is an email.</p> <p>20 Q. Sure.</p> <p>21 A. I didn't see any emails without Bates stamps.</p> <p>22 Q. So we can -- out of the production that's been</p> <p>23 given to us, all emails that aren't Bates labeled, we</p> <p>24 can take those out, because you didn't read those?</p> <p>25 A. I didn't see any emails that didn't have Bates</p>

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<p>58</p> <p>1 stamps.</p> <p>2 Q. Okay. Because that'll give us a better idea of</p> <p>3 what documents you did get through.</p> <p>4 A. Okay.</p> <p>5 Q. Because there's a number of them.</p> <p>6 A. Okay.</p> <p>7 Q. Wouldn't you agree that Mr. Daniels is creating</p> <p>8 a policy for vetting information?</p> <p>9 A. For vetting this specific type of information.</p> <p>10 Q. Right. So if I say all information, and that's</p> <p>11 a specific type of information, the answer to my</p> <p>12 question is yes, true?</p> <p>13 A. Not all information. Just this type of</p> <p>14 information, yes.</p> <p>15 Q. Right. Other than the one that I just was --</p> <p>16 had the privilege of teaching you about, are there any</p> <p>17 other policies regarding the vetting of information at</p> <p>18 Infowars that began February 2018 to today?</p> <p>19 A. I don't believe so. But I will say, just --</p> <p>20 just a caveat to this is, in my conversations -- I don't</p> <p>21 want to make you think, like, Mr. Daniels didn't talk to</p> <p>22 me about this. I was aware of this. I just never saw</p> <p>23 this particular email.</p> <p>24 Q. I --</p> <p>25 A. I just -- I just wanted to make sure that</p>	<p>60</p> <p>1 I think that that's checking the veracity of the</p> <p>2 information. So, no.</p> <p>3 Q. Outside of articles, what about with on-air</p> <p>4 talent?</p> <p>5 A. I think that that would apply on air, as well.</p> <p>6 Q. Okay. So anything that went out on air, that</p> <p>7 was, quote, unquote, journalism --</p> <p>8 A. Uh-huh.</p> <p>9 Q. -- would have multiple sources to back it up,</p> <p>10 true?</p> <p>11 A. Assuming it was journalism, it should have</p> <p>12 multiple sources.</p> <p>13 Q. Okay. Who told you that?</p> <p>14 A. So that's based on my conversation with</p> <p>15 Mr. Daniels, when I asked him about prior to him being a</p> <p>16 supervisor, if Kurt Nimmo had the same policy -- we're</p> <p>17 calling it a policy; although, it's not a written</p> <p>18 policy, but it is an understanding that it would have</p> <p>19 multiple sources.</p> <p>20 When I spoke to Adan, his position was</p> <p>21 similar that he agreed that he was expected to cite to</p> <p>22 more than one source. And that during the writing</p> <p>23 process -- and they circulate amongst themselves</p> <p>24 articles -- they would try to check to make sure each</p> <p>25 other's articles have multiple sources.</p>
<p>59</p> <p>1 we're -- you're aware of that. It's not that I didn't</p> <p>2 know that this -- he made this policy. It's just I</p> <p>3 didn't see this particular document.</p> <p>4 MR. OGDEN: Madam Court Reporter, I'm</p> <p>5 gonna object to all of that as nonresponsive.</p> <p>6 Q. (By Mr. Ogden) Other than the policy that you</p> <p>7 just got put in front of you today, the -- you were also</p> <p>8 tasked with the -- actually, let's back up. Sorry.</p> <p>9 Other than that policy there, are there</p> <p>10 any other policies Infowars has in place to vet</p> <p>11 information?</p> <p>12 A. To vet information, no.</p> <p>13 Q. Okay. So from the inception of Infowars to</p> <p>14 February of 2000- -- actually, I don't know what the</p> <p>15 date is on that one.</p> <p>16 A. June 2018.</p> <p>17 Q. June 2018.</p> <p>18 There were no policies for whether or not</p> <p>19 anybody needed to vet the veracity of information that</p> <p>20 was disseminated by Infowars?</p> <p>21 A. The veracity, no. I do believe, based on my</p> <p>22 conversations with people, that there was a -- I don't</p> <p>23 want to say policy, but there was an understanding that</p> <p>24 there would be multiple sources used for articles, that</p> <p>25 you wouldn't rely solely on one source. But I don't</p>	<p>61</p> <p>1 But, again, that's not checking the</p> <p>2 veracity of the source. It's just checking to see if</p> <p>3 you have multiple sources.</p> <p>4 Q. I just asked for names.</p> <p>5 A. Sure.</p> <p>6 Q. I just asked for who. I didn't ask for</p> <p>7 anything else. I'll ask you follow-ups, I promise.</p> <p>8 I've got a lot of them. I'm really good at follow-up</p> <p>9 questions. It's probably one of my best qualities.</p> <p>10 A. I spoke to Adan and I spoke to Kit, and those</p> <p>11 are the two people I spoke to.</p> <p>12 Q. Perfect. Thank you.</p> <p>13 Are there any policies or procedures in</p> <p>14 place when it comes to using anonymous sources?</p> <p>15 A. I'm sorry. Can you be more specific.</p> <p>16 You mean about like 4chan, like that type</p> <p>17 of source?</p> <p>18 Q. Anonymous social media content. That would be</p> <p>19 what I am referring to.</p> <p>20 A. Okay. So if there is a policy or procedure</p> <p>21 about checking to make sure that something is -- that's</p> <p>22 seen on a social media source and it's anonymous.</p> <p>23 So when I asked this question, I don't</p> <p>24 think there's a policy, so to speak. Information, such</p> <p>25 as 4chan or on social media, I think I said earlier,</p>

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<p>62</p> <p>1 those are used more so as tips rather than sources. 2 So if it's seen on social media, 3 generally, we try to find another source or two, at 4 least make sure where that information is coming from 5 is, like, not a fake page or something like that. 6 Q. Okay. So -- and by fake page, you mean a page 7 that was recently created with a name of -- that's not 8 an actual person and maybe a picture that's not of a 9 person at all? 10 A. You mean like the profile picture? 11 Q. Any of it. 12 A. So when I talked to -- when I talked to Nikko, 13 his basic premise when he was trying to vet -- vet 14 guests, that was his process by just trying to make sure 15 that a person was who he said he was. 16 But as I said earlier, I think that -- 17 sites such as 4chan were used more as tips rather than 18 actual sources, and then they would try and go verify it 19 in another place. 20 Q. Okay. Like Twitter? 21 A. Like Twitter. On Twitter -- Twitter has also 22 links and cites to other news sources. So, like, if 23 something was trending, it would link to other news 24 articles, things like that. So Twitter could 25 potentially be a source to link to other sources.</p>	<p>64</p> <p>1 fired? 2 A. No. Mr. Daniels was not fired. 3 Q. Okay. Has anybody, to your knowledge, ever 4 been fired for doing that? 5 A. For doing that? I'm not sure if for doing 6 that, but there are people who have been terminated from 7 the company. 8 Q. I would assume so. It's been 30 years. 9 But for the specific topic that we were 10 talking about, which is has anybody ever been fired for 11 disseminating, recklessly, information that's just not 12 true? 13 A. I don't know. 14 Q. So when you say -- when I say, oh, they're not 15 gonna get fired, you say they could be. 16 Pure guess? 17 A. No. It's not a pure guess. 18 Q. Okay. 19 A. Because when I've spoken to Mr. Jones and 20 Melinda, who does HR, there are -- they couldn't name 21 for me specific instances where people had been fired, 22 but it is a possibility and it is listed in the handbook 23 as up to termination. So it is a possibility. 24 Q. What about prior to June 2018? 25 A. This handbook was not made in June 2018.</p>
<p>63</p> <p>1 Q. You've used the term trending a couple of times 2 today. 3 A. Yes. 4 Q. What's that mean? 5 A. On Twitter, there are -- there are -- I 6 don't -- I'm sorry. I don't personally use Twitter. 7 But on Twitter, there are news stories 8 that are trending for the day and the time. Some might 9 be breaking news. And so there's things on Twitter with 10 a hashtag that would be trending for that time period. 11 Q. So the hashtags that are attached to different 12 categories of information, based on that hashtag, 13 something could be trending if it was popular enough? 14 A. Sure. 15 Q. Okay. You -- we kind of went into the 16 anonymous social media content policies. And it sounded 17 like there were more like they're not rules; they're, 18 like, guidelines. 19 A. Guidelines is a good word, guidelines. 20 Q. Nobody's getting fired if they disseminate 21 something that's completely factually wrong, because 22 they pulled it off of 4chan and threw it up on Infowars 23 dot com, correct? 24 A. They could be. 25 Q. Okay. What would make -- was Mr. Daniels</p>	<p>65</p> <p>1 Q. Okay. When was it made? 2 A. It says effective date 10/1/2012. 3 Q. Okay. 4 A. So that was when this was last updated. 5 Q. I gotcha. So it's your position that that 6 employee handbook was updated in June of 2018? 7 A. No. I don't believe that this policy was ever 8 incorporated into this -- into this employee handbook. 9 Q. Was that employee handbook made specifically 10 for Infowars? 11 A. I don't know. It says Free Speech Systems on 12 it. When I asked Melinda about the handbook, because I 13 did ask to see it, she said it was there -- it predated 14 her tenure there, so she doesn't know who created it or 15 when. It was updated on that date, but it had existed 16 before then. 17 Q. You did ask Melinda, though? 18 A. I did talk to Melinda about the handbook, yes. 19 Q. And when she said she didn't know, surely you 20 went and asked Mr. Jones. 21 A. Oh, I don't think Mr. Jones would have known. 22 He -- he didn't write this. There was -- 23 Q. Okay. He's been at the company the longest, 24 though, correct? 25 A. Well, I mean, it's his company, but he wouldn't</p>

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<p style="text-align: right;">66</p> <p>1 have written this.</p> <p>2 Q. So he would -- he would know when that was</p> <p>3 initially implemented?</p> <p>4 A. I don't know if he knows that.</p> <p>5 Q. Right. Because you didn't ask him?</p> <p>6 A. I didn't ask him about the handbook, no. I</p> <p>7 asked Melinda. There was a -- I can't remember the name</p> <p>8 of the woman that was there before her. But...</p> <p>9 Q. Okay. Let's -- let's break this down.</p> <p>10 You asked someone about the handbook, and</p> <p>11 they said, I don't know, that was before I started here,</p> <p>12 right?</p> <p>13 A. Regarding when it was produced?</p> <p>14 Q. Correct.</p> <p>15 A. Yes.</p> <p>16 Q. And who produced it?</p> <p>17 A. She didn't know who produced it.</p> <p>18 Q. Why it was produced initially?</p> <p>19 A. I don't know why it would have -- why it's</p> <p>20 produced. But...</p> <p>21 Q. Right. So, yet, this person says I don't know,</p> <p>22 I don't know, I don't know, and that's where you stop</p> <p>23 your investigation?</p> <p>24 A. The person who probably would have known didn't</p> <p>25 work there anymore, and I didn't know how to reach her.</p>	<p style="text-align: right;">68</p> <p>1 A. That I didn't think he was a good source of</p> <p>2 information on that particular topic.</p> <p>3 Q. Do you think he's a good source of information</p> <p>4 on any topics?</p> <p>5 A. Sure.</p> <p>6 Q. Like what?</p> <p>7 A. Like what type of business the company is</p> <p>8 engaged in, as he started the business; like what he is</p> <p>9 doing on a daily basis on his shows; like some of the</p> <p>10 structure of the company, that type of information.</p> <p>11 Q. What person at the company is in charge overall</p> <p>12 of making sure all employees follow the rules?</p> <p>13 A. There's no one such person.</p> <p>14 Q. Okay. So if Alex Jones tries to fire someone</p> <p>15 because they violated a rule, there are other -- he --</p> <p>16 depending on the department, he may or may not have that</p> <p>17 power?</p> <p>18 A. I didn't say that.</p> <p>19 Q. Okay.</p> <p>20 A. Alex Jones is -- obviously, it's his company.</p> <p>21 So I'm sure he would have the ultimate say over whether</p> <p>22 someone got fired or not. But to a lesser extent, if</p> <p>23 there's some issue within a department, I'm sure the</p> <p>24 supervisor would take up the issue with the person,</p> <p>25 whatever the issue was. And if it escalated, I'm sure</p>
<p style="text-align: right;">67</p> <p>1 Q. You used the word probably.</p> <p>2 But you don't know, because you didn't ask</p> <p>3 anybody that was there when it was implemented?</p> <p>4 A. I couldn't. That person -- whoever would have</p> <p>5 been there is no longer there.</p> <p>6 Q. You don't think the owner of the company knows</p> <p>7 when he invoked an employee handbook?</p> <p>8 A. No, I don't.</p> <p>9 Q. Why?</p> <p>10 A. Because I don't think he would have had</p> <p>11 anything to do with this.</p> <p>12 Q. But you had conversations with him, right?</p> <p>13 A. I did have a conversation with him.</p> <p>14 Q. And you'd seen this document before that,</p> <p>15 right?</p> <p>16 A. Sure.</p> <p>17 Q. Okay. So you could have just asked?</p> <p>18 A. I could have.</p> <p>19 Q. But you chose not to?</p> <p>20 A. I don't know that I chose not to. I just</p> <p>21 didn't ask.</p> <p>22 Q. Okay. You either didn't care or you chose not</p> <p>23 to, correct?</p> <p>24 A. No.</p> <p>25 Q. Okay. What's the other alternative?</p>	<p style="text-align: right;">69</p> <p>1 Alex would take care of it.</p> <p>2 Q. Okay. So when I asked who, if anyone, at</p> <p>3 Infowars is -- is overall in charge, the answer to that</p> <p>4 question is Alex Jones?</p> <p>5 A. Whether he had the ultimate say, sure.</p> <p>6 Q. Were there any policy -- the -- the policies in</p> <p>7 place in February of 2018 regarding the reliability of</p> <p>8 4chan posting -- or the information in 4chan posts and</p> <p>9 any facts or knowledge informing that position, that's</p> <p>10 one of the topics you're tasked with, correct?</p> <p>11 A. I believe so.</p> <p>12 Q. Okay. What was the company's position?</p> <p>13 A. On 4chan?</p> <p>14 Q. (Nodding.)</p> <p>15 A. On 4chan, I think, as I testified earlier, it</p> <p>16 was more so used as a tip. And then the general</p> <p>17 position -- guideline, I think is the word you used --</p> <p>18 you should always make sure to have multiple sources,</p> <p>19 and that would include for 4chan.</p> <p>20 Q. Okay. Multiple additional sources is what you</p> <p>21 said?</p> <p>22 A. I think -- well, it says here multiple editors.</p> <p>23 But I think that it -- based on my conversation, it was</p> <p>24 at least two sources.</p> <p>25 Q. Okay.</p>

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<p>70</p> <p>1 A. I don't know that there was a specific number 2 attached to that guideline. 3 Q. Who told you about the two-source rule? 4 A. When I spoke to Mr. Daniels, he indicated that 5 prior to that -- this time period where he's the 6 supervisor, Kurt Nimmo was the supervisor, that was 7 generally his policy, as well. That was confirmed by 8 Adan when I spoke to him, as well. 9 Q. Can you remember if you spoke to Mr. Nimmo or 10 not? 11 A. I did not speak to Mr. Nimmo. 12 Q. Okay. Any particular reason? 13 A. I don't -- I don't know that I had his 14 information readily available, and I don't know that I 15 had the time to talk to him. I spoke to a lot of 16 people. 17 Q. Did you ask for it? 18 A. For Mr. Nimmo's phone number? Yes. I did ask 19 Melinda for it, and I don't know if she was able to find 20 it. 21 Q. Did she tell you? 22 A. Did she tell me? 23 Q. Actually, let's back up. 24 How'd you communicate with Melinda? 25 A. I spoke to Melinda in person.</p>	<p>72</p> <p>1 topics. 2 A. Yes. 3 Q. Okay. When did you see Google analytics? Was 4 that part of this morning, or was that part of when you 5 had it last week? 6 A. I believe I reviewed the Google analytics when 7 I spoke to Mr. Zimmerman last week, Thursday or Friday, 8 maybe. 9 Q. And that was for Fontaine, not for the Sandy 10 Hook's, correct? 11 A. I think for both. 12 Q. Okay. What did Mr. Zimmerman have to say about 13 the Fontaine case? 14 A. Specifically about the Fontaine case? 15 Q. Correct. 16 A. I think that what he -- 17 Q. Let's back up real quick. 18 A. Sure. 19 Q. I don't want any answers to start it might, 20 maybe, I think. Not here for your personal opinion; 21 and, frankly, I just don't care about it. I want to 22 know what you know and only what you know. If you don't 23 know, that's fine; you can say that. We have procedures 24 in place here where we can go and cure these 25 deficiencies.</p>
<p>71</p> <p>1 Q. Okay. And you just asked her for Kurt Nimmo's 2 phone number? 3 A. I asked her for a bunch of phone numbers, yes; 4 Kurt Nimmo's was among them. 5 Q. Okay. You don't -- you can't recall whether or 6 not you were given -- 7 A. No. I was not given it. 8 Q. -- Mr. -- 9 And what was Mr. Nimmo's position in 10 February 2018? 11 A. I -- I believe at that time he was the lead 12 writer. 13 Q. Okay. 14 A. So he would have been, like, the supervisor. 15 Q. Who's the lead writer currently? 16 A. I believe it's Mr. Daniels. 17 Q. Has Paul Watson ever held that title? 18 A. No. Paul Watson, I believe, has always been a 19 consultant. 20 Q. Okay. Now, the analytics for the number of 21 pages used for Mr. Daniels' article received by Free 22 Speech from February 14th to February 15th, 2018, are 23 you prepared to discuss that topic? 24 A. I -- I believe I did see Google analytics, yes. 25 Q. I asked you if you were prepared to discuss the</p>	<p>73</p> <p>1 A. Okay. I'm not -- 2 Q. So don't guess. 3 A. I'm not -- I don't specifically remember what 4 he said. 5 Q. Okay. As far as discussing the analytics and 6 the number of page views between February 14th and 7 February 15th for Free Speech Systems, you will be 8 relying wholly on the documents produced to plaintiffs 9 last night, correct? 10 A. That is a fair statement. 11 Q. Okay. 12 (Sotto voce conversation between 13 Mr. Bankston and Mr. Ogden.) 14 Q. (By Mr. Ogden) Yeah. Those are the documents 15 that were produced. 16 A. This was what was handed to me by counsel. So 17 I -- 18 Q. Okay. And when it was handed to you, Ms. Blott 19 represented to you that that's what was produced to us 20 last night? 21 A. I think so. 22 Q. Okay. Where in the documents -- can you point 23 to where in those documents you are going to pull the 24 analytics for the page use? 25 A. I'd have to look through every single page,</p>

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<p style="text-align: right;">74</p> <p>1 sir. It was produced -- I've not seen this before this 2 morning. 3 Q. Okay. So, yeah, so fair to say that if you 4 you've got to flip through everything, because you've 5 never seen some of these before, you're not prepared, 6 right? I'm not trying to trick you. I'm just... 7 A. No. I mean, I can't off the top of my head 8 tell you a specific number without looking at a 9 document, no. 10 Q. Sure. Give me a cheat sheet. Look through the 11 document. 12 A. I -- you want me to flip through all -- 13 couple-hundred pages? 14 Q. 333. 15 A. Okay. So, like I said, you want me to flip 16 through all couple-hundred pages? 17 Q. Sure. If you're -- if you are aware of what 18 you're looking for, it's not hard to flip through 333 19 pages. We'll wait. I'm okay with some awkward silence. 20 A. I mean, I don't imagine where it would be. 21 Q. I bet it's in that stack. You told me that it 22 was. 23 A. Well, I don't know if it is in this stack. I 24 didn't put this together. 25 Q. Now you are guessing. And we already talked</p>	<p style="text-align: right;">76</p> <p>1 supposed to flip through all these documents to find the 2 analytics? 3 A. I don't know if the analytics are in here is 4 what I'm telling you. 5 Q. Why didn't you bring them with you? If you 6 needed them to discuss Topic 4, why didn't you bring the 7 information you needed? 8 A. I don't know. 9 Q. Because without that information, it's safe to 10 say, you're not prepared to talk about Topic 4, are you? 11 A. I can't give you a specific number without 12 looking at it. 13 Q. Okay. And you don't -- as far as right now, 14 you don't have it? 15 A. I don't know if it's in here, no. 16 Q. Okay. Well, I'm gonna represent to you that 17 that's being unprepared. And if I'm wrong, Ms. Blott 18 will correct me right now. 19 MS. BLOTT: You're wrong. 20 MR. OGDEN: Okay. 21 MS. BLOTT: Now, would you like me to tell 22 you why? 23 MR. BANKSTON: Absolutely not. 24 MR. OGDEN: I don't, Ms. Blott. Because 25 the witness here, she's supposed to tell me.</p>
<p style="text-align: right;">75</p> <p>1 about what happens when you guess. 2 A. I'm not guessing. I didn't put this -- this 3 document together. 4 MR. BANKSTON: You said that it was in 5 there. 6 Q. (By Mr. Ogden) Yeah. You told me it was in 7 there, and then you said, well, I don't know if it's in 8 here. 9 So which one is? Were you lying then or 10 are you lying now? 11 A. I'm not lying at all. 12 Q. Sure. 13 A. I just don't know what's in here, because I 14 didn't put this together. 15 Q. Okay. Where's the materials you did put 16 together for this depo? 17 Yesterday you had a very extensive binder 18 with tabs and color-coding. It looked very 19 professional. 20 Where's the one for today, or are you 21 just -- this one is not as serious as yesterday? 22 A. It's not that it's not as serious. There 23 weren't a lot of documents in connection with this 24 specific case. 25 Q. Sounds like there were. You said, how am I</p>	<p style="text-align: right;">77</p> <p>1 Q. (By Mr. Ogden) So, actually, here's my 2 question: Tell me the page used for February 14th, 3 2018, for the -- for the web -- web page in question in 4 this lawsuit? 5 A. I think I already answered your question. 6 Q. How many? 7 A. I can't tell you a specific number without 8 looking at the document. 9 Q. Sure. Take your time. 10 A. I'm not gonna flip through all those pages. I 11 don't know if it's in there. 12 Q. Okay. Well, what do you -- 13 MR. BANKSTON: I think we need 14 (inaudible). 15 MR. OGDEN: Actually, let's take a break. 16 We're gonna get the Court on the phone. 17 MR. BANKSTON: Well, I think we should at 18 least give the court reporter a break. 19 MR. OGDEN: Yeah. We're gonna -- we're 20 off the record. 21 MR. BANKSTON: Let's talk about this. We 22 may be suspending the deposition. 23 THE VIDEOGRAPHER: We are off the record 24 at 10:18. 25 (Recess from 10:18 a.m. to 10:28 a.m.)</p>

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<p>78</p> <p>1 THE VIDEOGRAPHER: We are back on the 2 record at 10:28. 3 Q. (By Mr. Ogden) Ms. Paz, we just got back from a 4 break. I -- I observed you walk back into the room with 5 Ms. Blott and the documents that you brought with you 6 today. 7 Were -- did you -- were you able to go 8 through those documents during the break? 9 A. I did not look through the entirety of the 10 documents. I flipped through it. 11 Q. Before we call the Court and inform the Court 12 that the question -- a question has been asked verbatim 13 of Topic 4 on the deposition notice, the witness has 14 informed us that the responsive information might be in 15 the set of documents that she brought with her today and 16 she is refusing to look through it to find that 17 information, before we do that, now that we've come back 18 from a break, would you like to change your answers? 19 A. I don't believe it's in there. 20 Q. Okay. So if it's not in there and you didn't 21 bring anything else with you for this case, is it safe 22 to say you're not prepared to discuss Topic 4 today? 23 A. I can't discuss the exact numbers, but the 24 Google analytics are the ones that I reviewed that have 25 been produced in this case. So it's in the production,</p>	<p>80</p> <p>1 of landing pages for thousands of articles and thousands 2 of videos, and what I reviewed with Mr. Zimmerman were 3 the thousands of -- that Google analytics page that had 4 those thousands of landing pages. 5 Do I believe those were produced? Is that 6 what you're asking? 7 Q. No. Are you certain that the information for 8 the Fontaine post is in those analytics? 9 A. Yes. It would have been in the landing page 10 because it's all of our landing pages. 11 Q. Okay. Do you understand, as the corporate 12 representative, you are tasked with being able and 13 prepared to discuss the analytics of that post? 14 A. Yes. 15 Q. Okay. Are you prepared? 16 A. I can't testify as to the exact number because 17 I just don't have it in front of me. 18 Q. Okay. I'll ask my question a simpler way. 19 Are you prepared? 20 A. I don't have the number in front of me, so I 21 can't espys [sic] the number. 22 Q. So would that be on the yes side of prepared or 23 the no side? 24 A. I don't want to agree with your words. 25 Q. Okay. I'm not asking you to agree one way or</p>
<p>79</p> <p>1 but I just don't have it in front of me. 2 Q. Right. I understand the -- I mean, there's 3 81,000 pages of documents. 4 You understand that you're designated here 5 today -- 81,000, that's actually in the Sandy Hook case. 6 In the Fontaine case, it's like 450 7 documents, right? 8 A. It was a much smaller number. 9 Q. Right. And the -- you understand that you're 10 here as the corporate representative to discuss those 11 documents? 12 A. The 450 pages that you just mentioned? 13 Q. If the 450 pages contain the information that's 14 listed in a specific topic that you were given to be 15 prepared for? 16 A. I don't know if the Google analytics were 17 prepared amongst those 450 pages. I do know that Google 18 analytics were produced in connection with the general 19 Sandy Hook case. So we did not make a differentiation 20 between the -- this case and Sandy Hook case. As far as 21 the Google analytics, we produced analytics for all of 22 our landing pages. Amongst those, would have been this 23 particular article. 24 Q. You're certain? 25 A. Right. So what we did was there were thousands</p>	<p>81</p> <p>1 another. 2 I'm just asking you if you're prepared to 3 discuss Topic 4? 4 A. And as I've already testified, I can't testify 5 as to the exact number. I don't have the document in 6 front of me. 7 MR. OGDEN: Ms. Blott, before we have to 8 call the Court -- I really don't want to. 9 MS. BLOTT: Is it yes or no? 10 MR. OGDEN: Thank you. 11 A. No. I cannot testify to the number. 12 Q. (By Mr. Ogden) No, you are not prepared to 13 Discuss Topic 4? 14 A. No. 15 Q. Okay. Let's talk about Topic 5, the analytics 16 for the number of pages used after a retraction was 17 posted on April 2nd, 2018. 18 Are you prepared to Discuss Topic 5 today? 19 A. That would be the same answer as the 20 previous -- previous one. 21 Q. Which was, no, I'm not prepared to discuss the 22 topics that were laid out in Plaintiff's Notice of 23 Deposition of a Corporate Representative? 24 A. As far as the numbers, no. 25 Q. I'm sorry.</p>

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<p style="text-align: right;">82</p> <p>1 As far as the numbers, no, you are not 2 prepared or no -- 3 A. That was your question, yes, are you prepared. 4 Q. Right. Okay. Just making sure. That was a 5 bad question. I will be the first one to say I'm gonna 6 ask bad questions; I do it all the time. 7 Okay. Topic No. 6, the company's 8 knowledge of Mr. Fontaine. 9 A. (Nodding.) 10 Q. Are you prepared to discuss Mr. Fontaine? 11 A. Yes. 12 Q. Okay. What did you do to prepare for that? 13 A. So in addition to speaking to Mr. Daniels, I 14 spoke to -- I think we talked about we spoke to 15 Mr. Salazar. I spoke to Mr. Jones. I reviewed the 16 documents that we had and are in the production. And I 17 think that's the universe of information that I have on 18 that. 19 Q. Why'd you talk to Mr. Jones about the Fontaine 20 case? 21 A. I wanted to see what, if anything, he knew 22 about the case. 23 Q. Did -- 24 A. Which wasn't very much. 25 Q. Did he know anything?</p>	<p style="text-align: right;">84</p> <p>1 shortly thereafter within a few hours. I think it was 2 pretty late in the afternoon, and I think that what he 3 conveyed to me was that there -- I believe people had 4 left for the afternoon already, but that they had talked 5 about it amongst themselves, and that they agreed that 6 it should be taken down, and so it was taken down. 7 Q. Who is they? 8 A. According to my conversation with Adan, is he 9 spoke to the other writers. I want to say one of 10 them -- his name is -- you know what, I'm not really 11 sure the other two names. There's two other names. And 12 then had spoken with Kit, and then they all agreed that 13 it had been -- that it should be taken down. 14 Q. Okay. If I wanted to know what other two 15 writers were in the editorial discussion as to whether 16 or not to take the post down, how would I ascertain that 17 information? 18 A. I could -- I could probably get their names. I 19 just can't remember off the top of my head right now. 20 Q. How would you get them? 21 A. I'm sorry? 22 Q. How would you get those names? 23 A. I could ask for them. 24 Q. From whom? 25 A. From either Mr. Jones or Mr. Salazar or</p>
<p style="text-align: right;">83</p> <p>1 A. No, not really. 2 Q. You said not really and you said very much. 3 So what did Mr. Jones know about Fontaine, 4 specifically? 5 A. I don't think he really knew anything except 6 that there was this issue that happened and that it was 7 rectified in a relatively short period of time. 8 Q. I'm not asking you what you think. That's what 9 you know. 10 A. That's what he conveyed to me is what he knew. 11 Q. Let's slow down. I promise, I'll let you 12 finish your answer, if you let me finish my question. 13 I'm not asking you what you think. I'm 14 asking you what you know. 15 So what do you know? 16 A. I know that he doesn't know anything aside from 17 the article went up and it was taken down in a 18 relatively short period of time. 19 Q. Okay. That's Mr. Jones' knowledge of 20 Mr. Fontaine? 21 A. Right (nodding). 22 Q. Okay. What did Mr. Salazar have to say? 23 A. According to my interview with him, he thought 24 that it -- the article went up relatively late in the 25 afternoon, but there were some red flags relatively</p>	<p style="text-align: right;">85</p> <p>1 Mr. Daniels. 2 Q. Let's back up a little bit. 3 I thought you said Mr. Jones' knowledge 4 was restricted to only knowing that a post went up and a 5 post came down? 6 A. He knows who is in his writers -- in his 7 writing department. 8 Q. Okay. Are those the only two other writers in 9 his writing department, or are there more? 10 A. There's a group of three writers that are 11 generally the three main writers. 12 Q. Who was working that day? 13 A. I'm sorry. I don't have that informations in 14 front of me. 15 Q. Okay. 16 A. I -- I think we produced an exhibit yesterday 17 that might -- it might have been in there. But... 18 Q. And again, might, may, I thinks, I don't want 19 them. 20 A. Okay. I'm not sure. 21 Q. Not fair to jury. 22 A. All right. 23 Q. The only job -- you have a couple of jobs 24 sitting in that chair today. One of them is don't 25 guess.</p>

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<p style="text-align: right;">86</p> <p>1 And whether or not it's been produced is 2 irrelevant to me. Because I want to know, as the 3 corporate representative tasked with discussing these 4 topics, what you know. Okay? 5 Other than the two unknown writers, 6 Mr. Salazar, Mr. Daniels and Mr. Jones, did anyone else 7 at the company have any knowledge of Mr. Fontaine? 8 A. No. 9 Q. And I'm saying that from the date of 10 February 4th, 2018, to today. 11 A. No. We don't have any other information on 12 Mr. Fontaine. 13 Q. Okay. You don't -- no one knows where he 14 lives, correct? 15 A. I believe I read in an article he lives in 16 Massachusetts. But other... 17 Q. Was it an Infowars article? 18 A. No. 19 Q. So then why do I care? 20 A. That's why I'm saying. You're asking me what I 21 know, and I'm telling you what I know. 22 Q. On behalf of -- I'm not asking for your 23 personal knowledge. I'm asking you your knowledge as 24 the corporate representative. And I know it's a 25 confusing topic for people that don't do this all the</p>	<p style="text-align: right;">88</p> <p>1 Dropbox for this particular case. 2 Q. Okay. So an attorney gave you a document to 3 review, and you saw that it contained information about 4 the plaintiff, right? 5 A. Information about where he lived, yes. 6 Q. Information about the plaintiff. Not splitting 7 hairs here. 8 A. Right. 9 Q. And so then when you got the deposition notice 10 and you saw the company's knowledge of the plaintiff, 11 and you were like, oh, that document definitely is 12 knowledge of the plaintiff, you didn't ask any 13 follow-ups as to, hey, where'd this come from? Why? 14 When? 15 A. I didn't really think it was a relevant 16 question just 'cause it was clearly not our article. 17 Q. So it's -- does this ask for the knowledge of 18 Infowars' articles of the plaintiff? 19 A. No. 20 Q. No. It isn't. 21 Other than that one article, were there 22 any other articles that you came across or that were 23 given to you? 24 A. There were numerous articles in the production. 25 Q. About Mr. Fontaine?</p>
<p style="text-align: right;">87</p> <p>1 time, and I'm trying to be patient with you. 2 But when I say what you know, it means 3 what you know, based on the list of instructions on 4 information you were supposed to go and prepare. 5 A. And I do know it based on that, because it was 6 in the production. 7 Q. Okay. 8 A. I didn't do any independent research, if that's 9 what the question is. 10 Q. Okay. 11 A. I read it in the production. 12 Q. When you read it, did you ask: Hey, where'd 13 this come from? 14 A. Where did the piece of paper in the production 15 come from? 16 Q. Correct. 17 A. No. I didn't ask where it came from. 18 Q. Did you ask who pulled it and why? 19 A. No. 20 Q. Okay. Did you ask where this was saved? Are 21 there any others in that folder? 22 A. In what folder? 23 Q. Whatever folder this was in. 24 A. I don't know what folder you're talking about. 25 It was in -- amongst the production material in the</p>	<p style="text-align: right;">89</p> <p>1 A. About the issue for which he is suing, about -- 2 I don't know if there's any more personal information 3 about him, other than where he lives in the articles. 4 But there were numerous articles. 5 Q. Okay. Is it all in that production? 6 A. This production (indicating)? It's not in this 7 production. 8 Q. Is it in the previous production of the 9 Fontaine case? 10 A. That's where I saw it on the Dropbox. 11 Q. Did you do any -- did you do any searching on 12 your own to figure out if there were any other documents 13 about Mr. Fontaine at Infowars that were not in the 14 production? 15 A. Did I independently do a search? 16 Q. Right. Because yesterday you said that you did 17 a pretty in-depth search in the Sandy Hook case while 18 you were at Infowars searching for documents and 19 different things. 20 And so I'm asking you: Did you do the 21 same thing in the Fontaine case? 22 A. Well, yesterday what I testified to was I did a 23 search trying to -- trying to narrow down documents that 24 I should look at. So I did a search regarding search 25 terms.</p>

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<p>90</p> <p>1 Is that what you're referring to? Did I</p> <p>2 do the same thing here?</p> <p>3 Q. Let's break this down.</p> <p>4 Did you do a search -- when you did the</p> <p>5 search in the Sandy Hook case preparation --</p> <p>6 A. Yes.</p> <p>7 Q. -- was that search limited to only the</p> <p>8 documents that have been produced, or was that at</p> <p>9 Infowars -- you know, their -- their email servers or</p> <p>10 going through their files or that kind of thing?</p> <p>11 A. No. I didn't do any -- I didn't do that, no.</p> <p>12 Q. So you relied on the documents that were given</p> <p>13 to you by an attorney?</p> <p>14 A. Right.</p> <p>15 (Sotto voce conversation between Mr. Ogden</p> <p>16 and Mr. Bankston.)</p> <p>17 Q. (By Mr. Ogden) I just conferred with my</p> <p>18 co-counsel, and he went through the indexing of the</p> <p>19 first set of production. And last night he and I had</p> <p>20 the benefit of going through the new set of production.</p> <p>21 We don't see any of the articles that you're talking</p> <p>22 about.</p> <p>23 A. I'm sorry.</p> <p>24 Q. We don't see any of the articles that you're</p> <p>25 talking about referencing where Mr. Fontaine lives, what</p>	<p>92</p> <p>1 find the document that we were talking about.</p> <p>2 The stack of documents that's next to you,</p> <p>3 is that the production that was made last night?</p> <p>4 A. I believe so, yes.</p> <p>5 Q. Okay. Can you flip to the last page.</p> <p>6 A. (Witness complies.) Okay.</p> <p>7 Q. Okay. Can you read Bates number on it?</p> <p>8 A. The last one?</p> <p>9 Q. Yes, ma'am.</p> <p>10 A. DEFS000334.</p> <p>11 Q. Okay. The article we were talking about that</p> <p>12 identifies personal information about Mr. Fontaine,</p> <p>13 what's the Bates number on that?</p> <p>14 A. This one says Fontaine 001103 through 1104.</p> <p>15 Q. Okay. That would signify that there are 1104</p> <p>16 pages of production, correct?</p> <p>17 A. I don't know how these Bates numbers are</p> <p>18 produced, but I think that's accurate, yep.</p> <p>19 Q. Okay. Because when I asked you earlier how</p> <p>20 many documents were involved, we -- it appeared the</p> <p>21 global number of documents was about 425, correct?</p> <p>22 A. I think that was the number you put on it, and</p> <p>23 I said I didn't know how many documents there were, but</p> <p>24 that it was significantly less than Sandy Hook.</p> <p>25 Q. Okay.</p>
<p>91</p> <p>1 state he lives in, anything like that.</p> <p>2 A. I disagree. I remember -- I recall</p> <p>3 specifically reading articles.</p> <p>4 Q. Okay. Show me.</p> <p>5 A. I don't have the entirety of the production</p> <p>6 that has been produced in this case. I have the</p> <p>7 supplemental production, but I don't have that</p> <p>8 production.</p> <p>9 Q. You have -- so all this -- all this information</p> <p>10 was sent to you on Dropbox; is that true?</p> <p>11 A. Right.</p> <p>12 Q. You keep this in Dropbox.</p> <p>13 Okay. Did you bring your computer today?</p> <p>14 A. Sure.</p> <p>15 MR. OGDEN: Okay. Let's take a break.</p> <p>16 Let her pull her computer out and find the documents in</p> <p>17 the production that she has in the Dropbox, and then she</p> <p>18 can point us to what she's talking about.</p> <p>19 THE VIDEOGRAPHER: We are off the record</p> <p>20 at 10:42.</p> <p>21 (Recess from 10:42 a.m. to 11:02 a.m.)</p> <p>22 THE VIDEOGRAPHER: We are back on the</p> <p>23 record at 11:02.</p> <p>24 Q. (By Mr. Ogden) We just took a break so that you</p> <p>25 could look through some materials on your computer to</p>	<p>93</p> <p>1 A. I don't think I ascribe -- subscribed to that</p> <p>2 number.</p> <p>3 Q. Okay. The -- how many documents, roughly, did</p> <p>4 you review in the Fontaine case?</p> <p>5 A. A few hundred documents, probably.</p> <p>6 Definitely -- definitely more than a couple hundred</p> <p>7 documents. It probably would be in the range of five or</p> <p>8 600 pages total.</p> <p>9 Q. So if there are 1,104 pages, it's safe to say</p> <p>10 you didn't review it all?</p> <p>11 A. I don't know if that's the end of production.</p> <p>12 Q. That's fine.</p> <p>13 A. Yeah.</p> <p>14 Q. But if there are 1100, you didn't look at 1100?</p> <p>15 A. I don't know that I looked at 1100 pages, no.</p> <p>16 Q. Probably more like half?</p> <p>17 A. I don't know how many.</p> <p>18 Q. Do you know when that document was produced?</p> <p>19 A. It doesn't say when it was produced.</p> <p>20 Q. What article -- what's the source of that</p> <p>21 article?</p> <p>22 A. You mean where did this article come from?</p> <p>23 Q. Yes.</p> <p>24 A. I don't know how it came to be in our</p> <p>25 possession. I know it appears to be a -- American</p>

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<p>94</p> <p>1 Statesman article dated 4/2/2018. But, otherwise, I 2 don't know where else it came from. 3 Q. Okay. You don't know who -- who in Infowars 4 found it, saved it, anything like that? 5 A. That's assuming anybody at Infowars did do 6 that. I don't know if that's accurate. 7 Q. Okay. So this production could have come from 8 outside of Infowars and someone slapped a Fontaine 9 sticker on it? 10 A. No. Someone could have sent it to us. It 11 could have been produced in connection with the 12 litigation by one of our attorneys. I just -- just 13 don't know how it came to be in the company's 14 possession. 15 Q. Okay. So as far as the knowledge of the 16 defendants, with regards to Mr. Fontaine, you aren't 17 sure where that knowledge came from or how it was given, 18 if at all, to Infowars? 19 A. Regarding his location in Massachusetts? 20 Q. Yes. 21 A. Well, I can testify as to the source of my 22 knowledge of these articles. But as far as how these 23 articles came to be in our possession, no, I don't know 24 that. 25 Q. Okay. And you understand that you're here to</p>	<p>96</p> <p>1 A. Yes, that's true. 2 Q. Did you come across any documents that were 3 stamped confidential during your review? 4 A. That document may have been stamped 5 confidential. 6 Q. Do you -- 7 A. I'm not sure. 8 Q. In general, do you remember any documents? 9 A. I don't remember anything stamped confidential. 10 Q. Okay. Other than Mr. Fontaine's mental health 11 records that were given to you by counsel and the 12 article that is Bates labeled Fontaine 1103 and 1104, 13 does the company have any other knowledge of 14 Mr. Fontaine? 15 A. This might not be the only article that would 16 list his location in Massachusetts. So I don't know if 17 this is the only article. But I think that that's the 18 entirety of what the company knows about Mr. Fontaine; 19 that's correct. 20 Q. Okay. Did you look at the posts that the 21 company had done that displayed Mr. Fontaine's image? 22 A. Oh, you mean the -- the specific -- the 23 photograph, you mean? 24 Q. Any -- any post that the company has made -- 25 A. I viewed --</p>
<p>95</p> <p>1 testify on how they came -- our possession? It's not 2 your personal knowledge, but you're here to testify the 3 company's knowledge? 4 A. Yes. 5 Q. Okay. You can't do that as far as where this 6 document came from when, why, or how? 7 A. I don't know where this document came from, no. 8 Q. Okay. Are there any other documents -- 9 (Mr. Bankston enters.) 10 Q. (By Mr. Ogden) -- that contain information that 11 Infowars has on Mr. Fontaine similar to this one? 12 MR. BANKSTON: Bates number on it. Bates 13 don't go that high in this case. 14 MR. OGDEN: I agree. 15 Q. (By Mr. Ogden) There any others, besides the 16 one you're viewing now? 17 A. Yes. I do recall a report from a psychologist. 18 I believe that might have been produced by plaintiffs. 19 I recall reading a letter from his psychologist or 20 therapist. 21 Q. Okay. So Mr. Fontaine's personal information 22 was shared with you, and you have not signed a 23 protective order; that's true? 24 A. I don't have -- I didn't sign anything, no. 25 Q. So true?</p>	<p>97</p> <p>1 Q. -- with Mr. Fontaine's photograph? 2 A. Sure. I viewed the post -- or I should call it 3 an article regarding this -- the Parkland shooting that 4 contained that -- the photograph of Mr. Fontaine. 5 Q. Did you read the comments? 6 A. I've read some comments. There -- there are 7 also a bunch of comments on other sites regarding that 8 photograph. But... 9 Q. Okay. When you were going through -- and I'm 10 gonna mark these Exhibits 2 and 3. 11 (Exhibits 2 and 3 marked.) 12 Q. (By Mr. Ogden) When you were reviewing the 13 documents that were previously produced in this case -- 14 give you some printouts. 15 Do you understand that those are Bates 16 labeled 252 and 296? Do you see that at bottom? 17 A. I see that, yes. 18 Q. Okay. Did you come across documents like this 19 when you were reviewing? 20 A. I did see some photo -- see some pages that 21 looked like this. 22 Q. Okay. So when you had them, you couldn't 23 access these either, correct? 24 A. No. 25 Q. Okay. So when you got them, did you download</p>

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<p>98</p> <p>1 them immediately?</p> <p>2 A. When I got what?</p> <p>3 Q. Well, there's been an accusation in this case</p> <p>4 that the reason that the production looks like this is</p> <p>5 because we didn't download them when they were sent;</p> <p>6 however, we did, and you just verified that you don't</p> <p>7 have -- yours looked like this, too, correct?</p> <p>8 A. What I have in the Dropbox.</p> <p>9 Q. Okay. When -- did you ask anybody, hey, where</p> <p>10 are these web pages?</p> <p>11 A. I think that what you just said was what was</p> <p>12 conveyed to me, which was, there are links that we no</p> <p>13 longer have anymore.</p> <p>14 Q. Okay. So who told you that?</p> <p>15 A. I don't know if I can testify as to --</p> <p>16 MS. BLOTT: Attorney-client --</p> <p>17 A. Right.</p> <p>18 MS. BLOTT: Objection; attorney-client</p> <p>19 privilege.</p> <p>20 Q. (By Mr. Ogden) Okay. When were you told that</p> <p>21 these web pages were no longer available?</p> <p>22 A. When I was reviewing the Fontaine material this</p> <p>23 past week.</p> <p>24 Q. Okay. So it was in the last seven days?</p> <p>25 A. Right.</p>	<p>100</p> <p>1 Q. Okay. I'm gonna represent to you that I</p> <p>2 produced this.</p> <p>3 A. Okay.</p> <p>4 Q. Other than the production that we've provided</p> <p>5 to defendants, are there any -- is there any other</p> <p>6 knowledge of Mr. Fontaine that anyone at Infowars has?</p> <p>7 A. Based on my review, no, nothing that I can see.</p> <p>8 If you produced this, then we didn't have this in our</p> <p>9 original -- in our material.</p> <p>10 Q. Okay. Did you review a letter that was sent</p> <p>11 after the article went up requesting a retraction and</p> <p>12 correction?</p> <p>13 A. Yes. I did see that.</p> <p>14 Q. Okay. And the information in that is -- states</p> <p>15 that Mr. Fontaine is, in fact, not Mr. Cruz and the post</p> <p>16 is incorrect, correct?</p> <p>17 A. That's what the letter says.</p> <p>18 Q. Okay. So that would be knowledge of the</p> <p>19 plaintiff, as well, correct?</p> <p>20 A. I don't think that's knowledge of the</p> <p>21 plaintiff.</p> <p>22 Q. Okay. Prior to that letter, was the company</p> <p>23 aware they had posted a picture of the wrong person?</p> <p>24 A. Yes. Because we had taken it down before we</p> <p>25 received that letter.</p>
<p>99</p> <p>1 Q. Once you informed them that the pages were no</p> <p>2 longer available, was that the end of the conversation,</p> <p>3 or did it go any further?</p> <p>4 A. When I was informed?</p> <p>5 Q. Yes.</p> <p>6 A. No. That was the end of the conversation.</p> <p>7 Q. They just said skip over them, we don't have</p> <p>8 them?</p> <p>9 A. They did not say that. But I can't testify as</p> <p>10 to what our communications were.</p> <p>11 Q. Okay. Did you skip over them because you</p> <p>12 didn't have them?</p> <p>13 A. I can't review something I don't have.</p> <p>14 Q. I can't either.</p> <p>15 A. Right. (Laughing.)</p> <p>16 Q. Finding some more common ground, Ms. Paz.</p> <p>17 Okay. The -- other than -- is it your</p> <p>18 understanding that the documents Fontaine 1103 to 1104</p> <p>19 has been produced to the plaintiffs in this case?</p> <p>20 A. I know that we've given over everything that we</p> <p>21 have. I -- I know that there have been some production</p> <p>22 issues as to what's been turned over to you. So I don't</p> <p>23 know what's been turned over to you. I know that it has</p> <p>24 a Bates label on it, so, to me, that means that it was</p> <p>25 produced.</p>	<p>101</p> <p>1 Q. Okay. When -- we'll get to that.</p> <p>2 How did the company -- what information</p> <p>3 would the company become aware of to take down the post?</p> <p>4 A. Just based on my comments -- or, I'm sorry --</p> <p>5 my communications with Mr. Daniels and interviews, I</p> <p>6 think that this -- this photograph was originally seen</p> <p>7 on social media by Mr. Daniels. He had seen it in a</p> <p>8 number of places on social media. He had put it in --</p> <p>9 it wasn't just unfortunate, it was on other locations on</p> <p>10 social media. And then he wrote the article. The</p> <p>11 article contained a photograph that says it's -- an</p> <p>12 alleged picture of the shooter. And then there were</p> <p>13 quickly chatter on social media that confirmed that that</p> <p>14 picture was not of the shooter. And so based on that,</p> <p>15 it was felt that that photograph was not accurate and</p> <p>16 taken down.</p> <p>17 Q. Okay. Where -- where was this chatter?</p> <p>18 A. Based on my conversations with Mr. Daniels,</p> <p>19 the -- it appears that it was on social media.</p> <p>20 Q. Okay. Did Infowars take steps to save any of</p> <p>21 that?</p> <p>22 A. To save what he reviewed?</p> <p>23 Q. To save whatever information on social media</p> <p>24 that he found chattering about the identity of</p> <p>25 Mr. Fontaine's photo?</p>

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<p style="text-align: right;">102</p> <p>1 A. No. But I will say that in this -- in this 2 material -- I don't know if it's production that you've 3 produced or we've produced -- there is a lot of social 4 media information and chatter talking about the identity 5 of the person in the photograph. So it could very well 6 have been something like that. But did -- did the 7 company take any steps to preserve those particular 8 posts, no. 9 Q. And just for the record, everything you said 10 about the article that you have in front of you marked 11 Fontaine 1103 and 04, that's just conjecture. 12 You have no idea when the company got 13 that, if it ever got it, and if it's ever been reviewed 14 by anybody other than an attorney? 15 A. This particular document? 16 Q. Yes, ma'am. 17 A. I know that it was produced by you because you 18 just told me it was produced by you. 19 Q. Right. 20 A. So it's not conjecture. 21 Q. You don't -- you don't know -- right. But you 22 said, oh, well, this article has all this information 23 about social media chatter. But -- 24 A. No. This -- this article doesn't. No. 25 Q. Okay. Maybe I just misunderstood your</p>	<p style="text-align: right;">104</p> <p>1 it. 2 Q. Were they tax statements, or were they bank 3 statements? 4 A. I think they were his tax returns. 5 MR. OGDEN: Ms. Blott, I don't have those. 6 MR. BANKSTON: Yeah, we definitely don't. 7 MR. OGDEN: What do we do here? 8 MR. BANKSTON: Because if she reviewed 9 them... 10 MR. OGDEN: I gotcha. 11 MS. BLOTT: They were produced in the net 12 worth discovery in the Sandy Hook case; I know that. 13 MR. BANKSTON: No. 14 MR. OGDEN: Not in Texas. 15 MR. BANKSTON: No, they were. 16 Mr. Reeves specifically (inaudible) 17 against that. 18 MR. OGDEN: While you're looking for that, 19 can I proceed a little bit with this? 20 MS. BLOTT: Yeah. 21 MR. OGDEN: Okay. 22 Q. (By Mr. Ogden) So you discussed with Melinda 23 the company structure, the profit-loss, PQPR, and 24 Mr. Jones' tax statements. 25 Anything else?</p>
<p style="text-align: right;">103</p> <p>1 question. And, frankly, I think I got what I need out 2 of this. 3 A. Okay. 4 Q. The net worth of the company, are you prepared 5 to discuss that? 6 A. Yes. 7 Q. Okay. What did you do to prepare for that 8 topic? 9 A. So this also was in the binder from yesterday 10 that we marked as Exhibit 8, I believe. But I do also 11 have another copy of that. But, essentially, what I did 12 was I sat with Melinda, who does the QuickBooks, and I 13 went through the profit-loss sheet for 2020 -- that's 14 the most recent time that that is -- that information is 15 available -- and we discussed the profit-loss sheet. 16 But I -- 17 Q. Okay. What else did you do? 18 A. I discussed with Melinda the structure of the 19 company so that I could understand the reasons why I was 20 seeing what I was seeing and the numbers and the 21 relationship between Free Speech and other companies, 22 such as PQPR, because there are some -- some debts 23 owed -- due and owing amongst the companies. And I may 24 have -- I think I may have reviewed Alex's tax 25 statements, which I believe you have. I think that's</p>	<p style="text-align: right;">105</p> <p>1 A. No, that's it. 2 Q. Are you positive? 3 A. (Nodding.) I believe so. That's -- I think 4 that's it, yes. 5 Q. Didn't ask if you believe you were positive. 6 A. That's it. 7 Q. Okay. Because yesterday I swore I heard you 8 say that you talked with Dustin Whittenburg. 9 A. Dustin is the -- is a tax attorney. 10 Q. What'd you talk to him about? 11 A. I did not talk to him about the company's 12 profit-loss. 13 Q. What'd you talk to him about? 14 MS. BLOTT: I'm gonna object to the extent 15 of attorney-client privilege and any conversations that 16 she had with Mr. Whittenburg. 17 Q. (By Mr. Ogden) Who's Mr. -- Mr. Whittenburg's a 18 tax attorney for who? 19 A. I believe he's a tax attorney for the company. 20 Q. Okay. I'm not gonna ask you what you talked 21 about; I'm gonna ask why you talked to him. 22 A. I think that would necessitate I talked to him 23 about what we talked about. 24 Q. I don't think it would necessitate that. 25 Why'd you talk to him?</p>

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<p style="text-align: right;">106</p> <p>1 A. Because I felt like maybe I should talk to him.</p> <p>2 Q. Why'd you feel that way?</p> <p>3 A. To get a better idea about the company, and</p> <p>4 that was pretty much it.</p> <p>5 Q. A better idea about what about the company?</p> <p>6 A. Sir, I do believe that these are privileged</p> <p>7 conversations.</p> <p>8 Q. That's fine. I'm not asking what y'all talked</p> <p>9 about. I'm not asking about the communications. I'm</p> <p>10 asking your beliefs and feelings going forward in your</p> <p>11 preparation for today. And you said that you wanted to</p> <p>12 talk to him. And so I'm asking why did you want to talk</p> <p>13 to him.</p> <p>14 A. I didn't specifically ask to talk to him, no.</p> <p>15 So he came, and I talked to him. But I didn't</p> <p>16 specifically request that I talk to him. I don't think</p> <p>17 I ever testified that I requested to speak to him.</p> <p>18 MR. OGDEN: Can you read back her prior</p> <p>19 answer.</p> <p>20 (The record was read as requested.)</p> <p>21 Q. (By Mr. Ogden) So you said you talked to him</p> <p>22 because you wanted a better idea of the company,</p> <p>23 correct?</p> <p>24 A. He was there; I spoke to him.</p> <p>25 Q. Not my question. Not even close.</p>	<p style="text-align: right;">108</p> <p>1 A. Sure. No, I did not have a concern about</p> <p>2 ethical violations on the part of the accountants.</p> <p>3 Q. Did you speak with Robert Roe?</p> <p>4 A. I did.</p> <p>5 Q. Okay. Are you aware of his history in</p> <p>6 litigation regarding Sandy Hook cases?</p> <p>7 A. I'm sorry. Can you be more specific.</p> <p>8 Q. Yeah. Did you know that -- that the defendants</p> <p>9 in that case were sanctioned because Mr. Roe had been</p> <p>10 found by the Court to have manipulated the QuickBooks</p> <p>11 entries prior to producing them? Did you know that?</p> <p>12 A. I'm aware there was an issue to which there was</p> <p>13 a profit-loss statement or something to that effect that</p> <p>14 there were missing lines that weren't produced at the</p> <p>15 bottom that were subsequently reproduced. So I'm aware</p> <p>16 of that issue, yes.</p> <p>17 Q. Did you read the Court's order?</p> <p>18 A. I did not read the Court's order, no.</p> <p>19 Q. Well, how did you find out the information you</p> <p>20 just regurgitated?</p> <p>21 A. I was told that by Mr. Roe and in discussions</p> <p>22 with counsel.</p> <p>23 Q. Okay. Because I encourage you to go read that</p> <p>24 order.</p> <p>25 What about any lawyers?</p>
<p style="text-align: right;">107</p> <p>1 I said you spoke to him because you wanted</p> <p>2 a better idea of the company, correct?</p> <p>3 A. He was there, and he was available, and I could</p> <p>4 get a better idea about the company. So I said I</p> <p>5 could -- so I figured I would talk to him.</p> <p>6 Q. What about the company?</p> <p>7 A. About the structure of the company, about</p> <p>8 the -- how the company runs. We also talked about some</p> <p>9 other privileged information. But that's pretty much</p> <p>10 it.</p> <p>11 Q. Okay. You do any white collar law?</p> <p>12 A. Not usually, no.</p> <p>13 Q. During any of your preparation for yesterday or</p> <p>14 today, were there any instances where you drew concern</p> <p>15 as far as any ethical duties that may have -- may or may</p> <p>16 not have been violated by anyone in this case?</p> <p>17 A. I'm sorry. Can you be more specific.</p> <p>18 Anyone meaning who, like the attorneys?</p> <p>19 Q. Anybody you talked to.</p> <p>20 A. Did I have a concern about ethical violations</p> <p>21 by attorneys, by accountants?</p> <p>22 Can we break that down a little bit.</p> <p>23 Q. Sure.</p> <p>24 A. Sure.</p> <p>25 Q. We'll start with accountants.</p>	<p style="text-align: right;">109</p> <p>1 A. Do I have concerns about whether lawyers in the</p> <p>2 case have breached duty to the company? Is that your</p> <p>3 question?</p> <p>4 Q. Only with regard to anything you came across</p> <p>5 while preparing for the last two depositions.</p> <p>6 A. Anything regarding -- you mean the financial</p> <p>7 statements or anything in the entire universe of the</p> <p>8 case?</p> <p>9 Q. Anything that you came across in preparation</p> <p>10 for your depositions.</p> <p>11 A. I did have concerns on behalf of the company</p> <p>12 regarding the company's prior representation, yes.</p> <p>13 Q. What about it?</p> <p>14 A. The company's prior lawyers.</p> <p>15 Q. Okay. What about them?</p> <p>16 A. I think that there are issues that there have</p> <p>17 been -- even though the company has produced material to</p> <p>18 its at- -- attorneys, has not been produced</p> <p>19 appropriately and has resulted in many, if not all, of</p> <p>20 the sanctions.</p> <p>21 Q. Would that be in the Texas cases or the --</p> <p>22 A. Both.</p> <p>23 Q. -- Connecticut?</p> <p>24 Okay. Any lawyers in specifics?</p> <p>25 A. I think that there are specific issues</p>

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<p style="text-align: right;">110</p> <p>1 regarding Mr. Randazzao but -- although he doesn't have 2 an appearance in this file, and Brad Reeves, and perhaps 3 the -- I can't remember his name before him. 4 Q. There's six. 5 A. There's a bunch. And I agree with you, yes. 6 Q. Okay. So Brad Reeves, Mr. Randazzao -- I'll 7 just go -- Mr. Enoch. 8 A. I'm not sure about Mr. Enoch. I think he's -- 9 he's done a pretty decent job. 10 Q. T. Wade Jefferies? 11 A. I'm sorry. I don't know much about him. I 12 don't have an opinion about him. 13 MR. OGDEN: Burnett? 14 MR. BANKSTON: Michael Burnett. 15 Q. (By Mr. Ogden) Michael Burnett? 16 A. I don't have an opinion about him either. 17 MR. BANKSTON: Bob Barnes. 18 Q. (By Mr. Ogden) Bob Barnes. 19 A. Barnes. 20 Q. You did have an issue with him? 21 A. Yes. 22 Q. Okay. 23 MR. OGDEN: Is that Whitehurst -- 24 MR. BANKSTON: It's Wilhite. 25 Q. (By Mr. Ogden) Wilhite?</p>	<p style="text-align: right;">112</p> <p>1 A. Yes. I'm -- I'm not really sure which time 2 periods are overlapping and who was responsible for 3 what. But, generally, based on my discussions, those 4 were my issues. 5 Q. And we'll just go in order. We'll start with 6 Mr. Randazzao. 7 So while his pro hac was pending, his 8 representation of the company caused a disorganization 9 and inability to tell whether or not something had or 10 had not been produced, correct? 11 A. Right. What -- and, also -- I don't even know 12 whether he was communicating to us about what needed to 13 be produced or what was still outstanding, if there was 14 anything outstanding. So, in general, there were a lot 15 of issues regarding production. 16 THE WITNESS: Here. (Handing phone to 17 Ms. Blott.) 18 Q. (By Mr. Ogden) Mr. Randazzao, was he in charge 19 of the litigation? 20 A. At what time? 21 Q. When he was involved. 22 A. I don't know the time period. I'm sorry. I 23 know there's a lot -- there's some overlap. There were 24 six or seven other attorneys at various points, so I 25 don't know the time period.</p>
<p style="text-align: right;">111</p> <p>1 A. Oh, I'm sorry. I don't have an opinion about 2 him either. 3 Q. And Ms. Blott? 4 A. I think Ms. Blott is fabulous. 5 Q. I think she is, too. 6 Okay. With regards to Mr. Randazzao, what 7 were your kind of issues you took with his 8 representation? 9 A. I think -- the company thinks that there have 10 been attempts by Mr. Randazzao to gain entry into Texas 11 pro hac vice. Those attempts were unsuccessful 12 ultimately. But while those issues were pending, there 13 were orders and time lines and deadlines and scheduling 14 orders that were in place that weren't being responded 15 to in a timely fashion. 16 There's also some issues regarding the 17 organization. I think we already talked about the Bates 18 stamp and how they're not necessarily organized 19 appropriately so we know which -- what was produced 20 where. I think I said that yesterday, as well, that I'm 21 not really sure what documents were produced in which 22 cases. And that's a problem with the organization 23 amongst the attorneys. 24 Q. I want to -- and I assume that was the problem 25 for Mr. Barnes, Mr. Reeves, and Mr. Randazzao?</p>	<p style="text-align: right;">113</p> <p>1 Q. I'll just say this: At some point since the 2 Sandy Hook and the Fontaine case have been filed, 3 Mr. Randazzao was representing the defendants in these 4 defamation suits? 5 A. Yes. 6 Q. Okay. As he was doing his representation in 7 the litigation, did -- did he have an explanation as to 8 when he would be pro hac -- filing a motion for pro hac 9 vice or, you know, kind of anything like that? 10 A. You mean to the company? 11 Q. Or -- correct. To the client -- his clients. 12 A. I think those -- he was having those 13 conversations ongoing about getting admitted. But we 14 were not being informed as to, you know, the issues 15 regarding the production and the time lines with the 16 case. 17 Q. And at that point, he was in charge of -- 18 A. I believe so. But I could -- like I said, I 19 don't know what dates. There's -- there's those 20 overlaps. 21 Q. Okay. Yeah. I went over this a little bit 22 with Mr. Shroyer in his deposition, and I'll ask you the 23 same thing. 24 Based on the information that you just 25 testified to, is the company -- has the company decided</p>

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<p style="text-align: right;">114</p> <p>1 one way or another on legal malpractice as a potential 2 asset?</p> <p>3 A. We have not decided on -- made any final 4 decisions on legal malpractice yet.</p> <p>5 Q. Okay.</p> <p>6 A. As to whether to file or who to file against, 7 we've not made any final decisions on that.</p> <p>8 Q. Okay. Is it being -- has it been discussed or 9 is it going to be discussed?</p> <p>10 A. It's being discussed.</p> <p>11 Q. I would ask that should that discussion happen 12 and that go forward, that the plaintiffs in this case, 13 as a potential creditor, just be made aware, because 14 that could be a potential asset to the company.</p> <p>15 A. Sure.</p> <p>16 Q. Was the company at all aware -- did 17 Mr. Randazzao inform the company at any --</p> <p>18 (Phone ringing.)</p> <p>19 MS. BLOTT: I'm stupid. Can we go off the 20 record a minute.</p> <p>21 MR. OGDEN: Do you need to take that?</p> <p>22 MS. BLOTT: No. I need to --</p> <p>23 Are we off the record?</p> <p>24 THE REPORTER: No.</p> <p>25 MS. BLOTT: Okay. I'm older than you</p>	<p style="text-align: right;">116</p> <p>1 he was practicing law in Texas without a license and 2 without any order on the pro hac vice?</p> <p>3 A. I don't -- I don't know the answer to that.</p> <p>4 Q. (By Mr. Ogden) Okay. Did Mr. Randazzao ever 5 work on the preparation of any pleadings or motions or 6 documents involved in this -- in these two actions in 7 Texas?</p> <p>8 A. I don't -- I don't know the answers if he -- if 9 he worked on them, like, as in drafts. I know he didn't 10 sign them because he couldn't sign them and file them. 11 But I don't know if he worked on them, no.</p> <p>12 Q. Okay. Did Mr. Randazzao give any legal advice?</p> <p>13 A. To the company?</p> <p>14 Q. Yes. Specific to the actions in Texas.</p> <p>15 A. I mean, he represented the company. So...</p> <p>16 Q. Okay.</p> <p>17 A. I -- I believe that that's a yes answer.</p> <p>18 MS. BLOTT: Don't guess.</p> <p>19 A. I mean, I haven't had any conversations with 20 Mr. Randazzao, so I don't --</p> <p>21 Q. (By Mr. Ogden) Did --</p> <p>22 A. -- know for sure.</p> <p>23 Q. -- did you receive -- we'll go back up to the 24 net worth. Well, because this is kind of all tied into 25 it.</p>
<p style="text-align: right;">115</p> <p>1 guys. I don't know how to make it quit ringing. Let me 2 just turn it off. And I sincerely apologize.</p> <p>3 MR. OGDEN: Hold the power button.</p> <p>4 THE WITNESS: The power button.</p> <p>5 MS. BLOTT: My son just bought this for 6 me.</p> <p>7 Is this the power button?</p> <p>8 (Siri responds: Interesting question.)</p> <p>9 MS. BLOTT: So y'all can all laugh at me.</p> <p>10 Okay?</p> <p>11 (Siri responds: I'm sorry.)</p> <p>12 MS. BLOTT: Oh, fuck you.</p> <p>13 I'm sorry. I apologize for my language.</p> <p>14 THE WITNESS: See, as to your question, I 15 said she's fabulous; that's why.</p> <p>16 MS. BLOTT: Why? Because I don't know how 17 to work an iPad?</p> <p>18 THE WITNESS: More so your language.</p> <p>19 But...</p> <p>20 MS. BLOTT: I apologize.</p> <p>21 THE WITNESS: I just proved the veracity 22 of my opinion.</p> <p>23 But go ahead.</p> <p>24 Q. (By Mr. Ogden) At any point during these 25 proceedings, did Mr. Randazzao inform the company that</p>	<p style="text-align: right;">117</p> <p>1 A. Sure.</p> <p>2 Q. When you talked with Mr. Whittenburg, did he -- 3 did you review any document that he gave you?</p> <p>4 A. I never spoke to Mr. Whittenburg.</p> <p>5 Q. Okay. I thought you had conversations with -- 6 with Dustin Whittenburg.</p> <p>7 A. Oh, I'm sorry. That's his name. I didn't know 8 his last name. You're right. I did talk -- talk to 9 Mr. Whittenburg.</p> <p>10 Q. Did you review any documents when you spoke 11 with him?</p> <p>12 A. No.</p> <p>13 Q. Okay. He didn't show me anything.</p> <p>14 MR. BANKSTON: Circle back on those tax 15 documents, too.</p> <p>16 (Brief pause as Mr. Ogden goes through 17 documents.)</p> <p>18 MR. OGDEN: This is gonna be Exhibit 4. 19 (Exhibit 4 marked.)</p> <p>20 Q. (By Mr. Ogden) Did you review this prior to 21 today?</p> <p>22 A. No.</p> <p>23 MR. BANKSTON: Oh, that's the number --</p> <p>24 Q. (By Mr. Ogden) You did -- you said you did not 25 look at the discovery responses?</p>

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<p style="text-align: right;">118</p> <p>1 A. I don't think I saw this, no. (Shaking head.)</p> <p>2 Q. Okay.</p> <p>3 A. Aside from the pleadings -- the petition, I</p> <p>4 think -- I think the petitions were the only pleadings I</p> <p>5 reviewed. So, no, I didn't read this.</p> <p>6 Q. I'll point you to Request for Production No. 4</p> <p>7 on Page 3.</p> <p>8 A. Okay.</p> <p>9 Q. And Request for Production No. 4 on Page 3</p> <p>10 says, all communications within Infowars relating to the</p> <p>11 plaintiff, the article in question, or efforts to</p> <p>12 ascertain the identity of the Douglas High School</p> <p>13 shooter.</p> <p>14 A. I see that.</p> <p>15 Q. In response, the answer is: After a diligent</p> <p>16 search, no responsive documents in Free Speech Systems'</p> <p>17 possession, custody, or control were identified.</p> <p>18 A. I see that.</p> <p>19 Q. Okay. Can you tell me what this search --</p> <p>20 how -- who did the search?</p> <p>21 A. So after speaking to Mr. Daniels, once we were</p> <p>22 informed that there was going to be a lawsuit, he</p> <p>23 searched through his personal computer. He searched</p> <p>24 through his phone, and, I believe, searched through</p> <p>25 anything that would have been on his computer at work,</p>	<p style="text-align: right;">120</p> <p>1 A. In the -- amongst the two cases. I don't know</p> <p>2 in this case specifically, but I know we've produced</p> <p>3 many thousands of emails.</p> <p>4 Q. Have any emails at all been produced in this</p> <p>5 case regarding Mr. Fontaine or specifically the</p> <p>6 information requested in requests for production?</p> <p>7 A. I don't believe that we had any responsive</p> <p>8 emails on Mr. Fontaine.</p> <p>9 Q. I didn't ask if you believed if you did. I</p> <p>10 asked if --</p> <p>11 A. We did not produce any emails because there</p> <p>12 were no responsive emails on Mr. Fontaine.</p> <p>13 Q. Okay. What -- when was the search done?</p> <p>14 A. I'm sorry. I don't know the answer to that.</p> <p>15 Q. Okay. What were the searching and culling</p> <p>16 terms?</p> <p>17 A. Because I don't know who did the search, I'm</p> <p>18 not sure who -- who did the search terms.</p> <p>19 Q. Okay. Did you -- when you came and did your</p> <p>20 interviews with members of the company, were you given</p> <p>21 any sort of restrictions on your access of who you could</p> <p>22 talk to?</p> <p>23 A. No. (Shaking head.)</p> <p>24 Q. Okay. Did you ask who did the search?</p> <p>25 A. I don't remember.</p>
<p style="text-align: right;">119</p> <p>1 and there was nothing found. So we -- we didn't have</p> <p>2 anything in our custody.</p> <p>3 Q. Okay. So it was -- there was just Mr. Daniels</p> <p>4 doing the search?</p> <p>5 A. Mr. Daniels searched his -- his specific phone</p> <p>6 and computer, and I believe -- I'm sorry -- let me just</p> <p>7 amend my response. I think that also we --</p> <p>8 Q. I don't want thinking.</p> <p>9 A. Because we did search our emails, and that was</p> <p>10 not done by Mr. -- by Mr. Daniels.</p> <p>11 Q. Okay.</p> <p>12 A. So we did search the emails, as well.</p> <p>13 Q. Okay. Who searched the emails?</p> <p>14 A. I don't know the identity of the person who</p> <p>15 searched the emails. I'm not -- I'm not sure. I</p> <p>16 think -- and, like I said, I'm not sure. So...</p> <p>17 Q. Then we can end it there.</p> <p>18 A. Right.</p> <p>19 Q. I don't know is -- is an answer that --</p> <p>20 A. I'm not sure.</p> <p>21 Q. Okay. And how do you know that they -- that</p> <p>22 someone did an email search?</p> <p>23 A. Because we've produced many thousands of pages</p> <p>24 of emails.</p> <p>25 Q. In this case?</p>	<p style="text-align: right;">121</p> <p>1 Q. Did you ask when the search was done?</p> <p>2 A. Well, so here -- here's the reason why I don't</p> <p>3 know is just because I know we have been dealing --</p> <p>4 there was a -- some third-party person, and I'm not</p> <p>5 really sure who or when that was. So I -- no, I'm not</p> <p>6 sure.</p> <p>7 Q. So you mean third party as in the defendants</p> <p>8 hired a person from a different company to search their</p> <p>9 own system?</p> <p>10 A. No. I don't know necessarily search. I know</p> <p>11 that was there was a mirror image done of our hard</p> <p>12 drives, and I don't know who did that. But I don't know</p> <p>13 who did the search, if it was that third party or</p> <p>14 someone in the company. It may very well have been</p> <p>15 Mr. Zimmerman, but I don't know.</p> <p>16 (Sotto voce conversation between Mr. Ogden</p> <p>17 and Mr. Bankston.)</p> <p>18 MR. OGDEN: Okay.</p> <p>19 Q. (By Mr. Ogden) And did you ask Mr. Zimmerman if</p> <p>20 he did the search?</p> <p>21 A. You know what, I may have, but I just -- I</p> <p>22 don't remember, as I sit here right now.</p> <p>23 Q. Did you ask Mr. Zimmerman what searching and</p> <p>24 culling terms he used in the ESI?</p> <p>25 A. That's assuming he did it. I don't know.</p>

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<p style="text-align: right;">122</p> <p>1 Q. Okay. Did you ask him if he was aware of who 2 did it?</p> <p>3 A. You know what, I don't recall.</p> <p>4 Q. Do you know when this third party imaged the 5 defendants' ESI system?</p> <p>6 A. No.</p> <p>7 Q. Okay. Do you remember how you became aware 8 that a third-party contractor had imaged the hard drives 9 at the defendants' place of business?</p> <p>10 A. I know that based on my discussions with 11 counsel that there had -- that had been done. I just 12 didn't know how or when.</p> <p>13 Q. (Inaudible.)</p> <p>14 A. I'm sorry?</p> <p>15 Q. I said excuse me. Water went down the wrong 16 pipe.</p> <p>17 Okay. So earlier you gave me a definitive 18 response that there are no communications, correct?</p> <p>19 A. I'm sorry. Communications regarding Requests 20 for Production 4?</p> <p>21 Q. Yes.</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And you've given me the affirmative.</p> <p>24 You're not saying you're not sure; you're 25 saying there are none, correct?</p>	<p style="text-align: right;">124</p> <p>1 A. No.</p> <p>2 Q. Okay. And based on those four points, you are 3 sitting here today definitive -- definitively telling 4 this jury that no communications exist, correct?</p> <p>5 A. Whatever -- whatever we had, we produced, and 6 we don't have anything.</p> <p>7 MS. BLOTT: It's yes or no.</p> <p>8 A. No.</p> <p>9 MS. BLOTT: Sorry.</p> <p>10 Q. (By Mr. Ogden) I'm sorry.</p> <p>11 And that question was -- well, a little 12 winded.</p> <p>13 But based on that, you're telling this 14 jury that there are no communications that exist, 15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Would you -- as -- you know, I'm not 18 even asking you as a lawyer.</p> <p>19 Do you think that that is a reliable basis 20 to come to that conclusion under oath swearing to God?</p> <p>21 A. I know that we've produced everything that we 22 have on Mr. Fontaine, so, yes.</p> <p>23 Q. So you believe that you have reliable 24 information to make that conclusion to the jury?</p> <p>25 A. Based on my review and my communications with</p>
<p style="text-align: right;">123</p> <p>1 A. Based on my review of the documents -- and I 2 know we've produced the document -- everything that we 3 have -- we do not have anything regarding Production 4 No. 4.</p> <p>5 Q. And the documents you reviewed were based on a 6 search that you do -- that you have no idea what the 7 parameters are, correct?</p> <p>8 A. You mean my search?</p> <p>9 Q. No.</p> <p>10 A. My search through the documents?</p> <p>11 Q. The documents were given to you by lawyers, 12 correct?</p> <p>13 A. Right.</p> <p>14 Q. Those documents were the result of someone 15 doing a search, correct?</p> <p>16 A. Yes.</p> <p>17 Q. You have no idea what was searched for, 18 correct?</p> <p>19 A. No, I don't know.</p> <p>20 Q. You don't know what terms -- searching terms or 21 culling terms were used, correct?</p> <p>22 A. No, I don't.</p> <p>23 Q. You don't know when it was done?</p> <p>24 A. No.</p> <p>25 Q. And you don't know who did it?</p>	<p style="text-align: right;">125</p> <p>1 the interviews. (Nodding) yes.</p> <p>2 Q. Okay.</p> <p>3 A. We produced everything.</p> <p>4 Q. By based on your communications, you mean the 5 conversation you had with Mr. Zimmerman that you don't 6 even remember?</p> <p>7 A. I don't remember the whole thing. I spoke to 8 Mr. Zimmerman a long time.</p> <p>9 Q. But you don't remember anything about the 10 definitive answer you're now giving the jury, correct?</p> <p>11 A. I don't know anything about who did the search.</p> <p>12 Q. Or if he did? When?</p> <p>13 A. He -- yeah. I don't know the specifics of 14 that; that's correct.</p> <p>15 Q. Okay. Gonna mark this Exhibit 5.</p> <p>16 (Exhibit 5 marked.)</p> <p>17 Q. (By Mr. Ogden) Earlier you said you hadn't 18 reviewed any of the pleadings or responses in discovery. 19 Is that true for this document, as well?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. I want to focus on Request for 22 Production No. 1.</p> <p>23 A. Okay.</p> <p>24 Q. Produce any documents which show what time on 25 February 14th, 2018 the challenged image was published</p>

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<p style="text-align: right;">126</p> <p>1 on Infowars dot com.</p> <p>2 The response says, Defendant will produce</p> <p>3 any additional responsive documents in its possession,</p> <p>4 custody, or control, correct?</p> <p>5 A. That's what it says.</p> <p>6 Q. Okay. When was the document first published,</p> <p>7 at what time?</p> <p>8 A. Based on my conversations with Mr. Daniels, it</p> <p>9 was published late in the afternoon, probably around</p> <p>10 4:00 p.m. That's...</p> <p>11 Q. So answer to my question is I don't know</p> <p>12 exactly, true?</p> <p>13 A. I -- I don't know exactly what time. But based</p> <p>14 on my conversations with Mr. Daniels, it was late in the</p> <p>15 afternoon.</p> <p>16 (Sotto voce conversation between Mr. Ogden</p> <p>17 and Mr. Bankston.)</p> <p>18 Q. (By Mr. Ogden) Earlier, you said once we were</p> <p>19 infer- -- informed that a lawsuit may be coming.</p> <p>20 Do you remember that, when you said that?</p> <p>21 A. In response to what question? I'm sorry.</p> <p>22 Q. This lawsuit, anything that you -- do you know</p> <p>23 when the company was informed there may or may not be a</p> <p>24 lawsuit?</p> <p>25 A. When we received your letter.</p>	<p style="text-align: right;">128</p> <p>1 A. You mean -- you mean other individuals besides</p> <p>2 Mr. Daniels?</p> <p>3 Q. Well, I'll give you a very specific one.</p> <p>4 The original post --</p> <p>5 A. Uh-huh.</p> <p>6 Q. -- was that preserved?</p> <p>7 A. I thought that -- you know, I don't -- I don't</p> <p>8 want to know -- say if I read the original post. But I</p> <p>9 do remember seeing the article as it is in current form,</p> <p>10 but I don't know if I read -- saw the original post.</p> <p>11 Q. So you don't -- sitting here today in a</p> <p>12 defamation lawsuit against the defendants, you're</p> <p>13 sitting as the corporate representative for the</p> <p>14 defendants, and you're not sure if you've even seen the</p> <p>15 defamatory post?</p> <p>16 A. The defamatory post was taken down the very</p> <p>17 next day. And so in its current form or in its original</p> <p>18 form was not preserved because we did not receive that</p> <p>19 preservation email from you or letter until after it was</p> <p>20 already taken down.</p> <p>21 Q. How do you know?</p> <p>22 A. Because we received that letter many weeks</p> <p>23 later.</p> <p>24 Q. You said you didn't know when you received the</p> <p>25 letter.</p>
<p style="text-align: right;">127</p> <p>1 Q. Okay. Do you remember the date on that?</p> <p>2 A. I don't remember the exact date.</p> <p>3 Q. Okay. Would you -- is it safe to say that once</p> <p>4 that letter was received, efforts were made by the</p> <p>5 defendants to preserve evidence?</p> <p>6 A. (Nodding) yes.</p> <p>7 Q. Okay. What were those efforts?</p> <p>8 A. As I had testified to earlier, Mr. Daniels was</p> <p>9 made aware of the letter, and he made efforts to search</p> <p>10 through his devices and report back whether there was</p> <p>11 anything responsive.</p> <p>12 And as I also testified, I don't know</p> <p>13 exactly when those searches were done for emails. So I</p> <p>14 can't really respond to it for the emails end of it.</p> <p>15 But...</p> <p>16 Q. So you can respond for Mr. Daniels,</p> <p>17 specifically, but not really for the company in any way,</p> <p>18 true?</p> <p>19 A. Regarding the emails?</p> <p>20 Q. Regarding the preservation of evidence.</p> <p>21 A. Regarding the preservation of the information</p> <p>22 on Mr. Daniels' devices, I can.</p> <p>23 Q. Right.</p> <p>24 A. For the company.</p> <p>25 Q. And the rest of the company?</p>	<p style="text-align: right;">129</p> <p>1 A. I don't know the exact date, but it was way</p> <p>2 after we took it down.</p> <p>3 (Sotto voce conversation between Mr. Ogden</p> <p>4 and Mr. Bankston.)</p> <p>5 Q. (By Mr. Ogden) Are you aware -- I'm gonna</p> <p>6 represent to you that our letter was sent to you on</p> <p>7 February 26th.</p> <p>8 A. Okay.</p> <p>9 Q. I'm going to then represent to you that this --</p> <p>10 there was no response and that a lawsuit was filed on</p> <p>11 April 1st. Okay?</p> <p>12 A. Okay.</p> <p>13 Q. I'm then going to represent to you that the</p> <p>14 retraction and -- in its current form, as you've</p> <p>15 referred to it as, was done on April 2nd, the next day.</p> <p>16 A. The post was taken down on February 15th. So</p> <p>17 10 days before your letter -- or 11 days before your</p> <p>18 letter.</p> <p>19 Q. The post was or the...</p> <p>20 A. The article was revised on February 15th.</p> <p>21 Q. To -- to say what?</p> <p>22 A. To take out the defamatory language.</p> <p>23 Q. Okay. So you would -- one thing we can agree</p> <p>24 on, there was defamatory language?</p> <p>25 A. I think that the photograph representing that</p>

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<p style="text-align: right;">130</p> <p>1 it was Mr. Fontaine was not accurate and represented him 2 to be a -- potentially the shooter at Parkland. So it 3 was removed on February 15th, along with the language 4 saying this is the alleged -- alleged photo of the 5 shooter was removed. 6 Q. When was the retraction done? 7 A. I don't know the date. 8 Q. April 2nd. 9 A. Okay. 10 Q. Did you our -- did you read the letter that 11 plaintiffs sent on February 26th? 12 A. Yes. I saw the letter. 13 Q. Okay. Based on that, do you have -- did -- 14 were you able to learn why defendants did not, pursuant 15 to the statute, do a proper retraction until after the 16 deadline that's in the statute? 17 A. I don't believe that that's accurate. I don't 18 believe we -- we missed the deadline per the statute. 19 And I do believe that we mitigated the -- the issue 20 regarding the photograph. 21 Q. Do you -- do you know if Mr. Fontaine's ever 22 even been to Florida? 23 A. No, I don't know. 24 Q. Do you know about the death threats that 25 Mr. Fontaine has received?</p>	<p style="text-align: right;">132</p> <p>1 mean? 2 A. Negative comments, not nice comments. 3 Q. Sure. Were there any threats? 4 A. Not that I recall. But... 5 Q. Okay. I encourage you after this depo to keep 6 reading, because there's a lot of them. 7 Is the -- are any of the defendants 8 apologetic for putting Mr. Fontaine through this? 9 A. Oh, yes. When I spoke to Mr. Daniels, he was 10 very, very upset, and he is very apologetic. So, yes. 11 Q. Usually when you're apologetic, you give an 12 apology to the person, correct? 13 A. I -- I would disagree with that when -- 14 especially when there's ongoing litigation. So I would 15 disagree with that. 16 Q. Right. You would tell your lawyer, and the 17 lawyers would tell each other, right? 18 A. Tell each other or tell the other lawyers. 19 Q. The lawyers would tell -- if Mr. Daniels wanted 20 to, at any point, he could have asked Ms. Blott or 21 Mr. Reeves, Mr. Randazzao, Mr. Barnes, Mr. Whitehurt -- 22 I forget -- Wilhite, Mr. Enoch, Mr. -- I mean, he could 23 have asked any of them, hey, I would like to apologize 24 to the plaintiff, and that could have been communicated 25 through the lawyers, right?</p>
<p style="text-align: right;">131</p> <p>1 A. I don't believe I reviewed anything like that 2 in the production. So, no. 3 Q. Well, you read our production. We know, 4 because you cited it, Fontaine 1103, 1104. 5 So you read some of my production, 6 correct? 7 A. I read some of your production. 8 Q. In that production, you didn't see any of the 9 horrific things that were said about him online in the 10 comment sections? 11 A. I'm sure there were horrific things. Yes. I 12 read a number of -- 13 Q. I didn't ask you if you were sure there were. 14 I'm asking you if you read them. 15 A. Yes. I did read them. 16 Q. Okay. So when I asked you whether or not you 17 know about it, I don't want to hear, oh, I'm sure there 18 were. I want to know whether or not you know. 19 A. Yes, I know. 20 Q. Okay. After reading some of those comments, 21 what did you come away with? 22 A. I came away with there was a misidentification 23 of Mr. Fontaine as the shooter and that there were 24 negative comments about him as a result. 25 Q. When you say negative comments, what do you</p>	<p style="text-align: right;">133</p> <p>1 A. I don't know if he was advised not to do that. 2 Q. (By Mr. Ogden) Oh, so the lawyers may have 3 advised him -- 4 A. I don't know. 5 Q. -- not to apologize? 6 A. I don't know the answer to that. 7 Q. Stop guessing. 8 A. Yeah. But you're asking me -- 9 Q. Keep reminding you of that. 10 A. But you're saying that he could have, and I 11 don't know that he could have because I don't know if he 12 was advised not to. 13 Like, I -- I will traditionally advise my 14 clients who commit offenses and criminal offenses, they 15 may be very apologetic, but they cannot make admissions 16 during the pendency of the case. 17 And so I don't know that he could have 18 done that. 19 Q. Do you know what happened to Mr. Shroyer after 20 he was -- he -- he communicated an apologetic message to 21 the plaintiffs? 22 A. Do I know if anything happened to him? No, I 23 don't know. 24 Q. So you don't know that -- where he currently 25 stands in this case?</p>

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<p style="text-align: right;">134</p> <p>1 A. What do you mean? Can you be more specific.</p> <p>2 Q. Whether or not --</p> <p>3 A. I know he's still a defendant in the case.</p> <p>4 Q. Yeah. Do you know whether or not he's a -- in</p> <p>5 negotiations to settle?</p> <p>6 A. I can't answer that.</p> <p>7 Q. Because you don't know?</p> <p>8 A. I don't know. (Shaking head.)</p> <p>9 Q. Okay. And does -- does -- do any of the</p> <p>10 defendants contend that they produced documents showing</p> <p>11 what time the article -- this article in question was</p> <p>12 originally published?</p> <p>13 A. No.</p> <p>14 Q. Okay. I want to go to Request for</p> <p>15 Production 2.</p> <p>16 A. Are we still on No. 5?</p> <p>17 Q. Yes.</p> <p>18 MS. BLOTT: Would this be a good time to</p> <p>19 take a break.</p> <p>20 MR. OGDEN: If I can get through this one,</p> <p>21 this will be the last of this document.</p> <p>22 MS. BLOTT: Okay. Thanks.</p> <p>23 A. Which one did you say?</p> <p>24 Q. (By Mr. Ogden) No. 2.</p> <p>25 A. Okay.</p>	<p style="text-align: right;">136</p> <p>1 challenged image, the plaintiff, or your efforts to</p> <p>2 ascertain the identity of Stoneman Douglas High School</p> <p>3 shooter.</p> <p>4 A. I see it.</p> <p>5 Q. Okay. Response: None known to exist.</p> <p>6 What does that mean?</p> <p>7 A. It means that at the time this was drafted, we</p> <p>8 didn't have any knowledge that we -- that existed that</p> <p>9 had these browser histories that were being requested.</p> <p>10 Q. Were there any attempts to -- to search for</p> <p>11 this information?</p> <p>12 A. I -- I don't know.</p> <p>13 MR. BANKSTON: Or preserve it.</p> <p>14 Q. (By Mr. Ogden) Were there any -- were there any</p> <p>15 efforts to preserve this information?</p> <p>16 A. I don't know. As I -- as I said, I think we --</p> <p>17 we -- we asked Mr. Daniels to search his computer. So I</p> <p>18 don't know if Mr. Daniels did it. So I don't know.</p> <p>19 Q. Did you ask anybody else?</p> <p>20 A. No.</p> <p>21 Q. Okay. So you didn't ask -- you didn't ask any</p> <p>22 of the individuals that you listed out to us --</p> <p>23 Mr. Salazar or the two ghost writers that we do not know</p> <p>24 the identities of, you didn't ask them to preserve their</p> <p>25 browsing history and to search it?</p>
<p style="text-align: right;">135</p> <p>1 Q. It says a copy of every version of the article</p> <p>2 in question which was published on Infowars' website.</p> <p>3 And the response is: Free Speech Systems</p> <p>4 has produced responsive documents in its possession,</p> <p>5 custody, or control.</p> <p>6 A. I'm sorry. Which one are you on?</p> <p>7 Q. No. 2.</p> <p>8 A. This one says, web browser history for No. --</p> <p>9 Request for Production 2.</p> <p>10 Q. Maybe I did -- oop, you're right. I'm sorry.</p> <p>11 I'm on the right one now.</p> <p>12 No. 2.</p> <p>13 A. This is Exhibit 2?</p> <p>14 Q. Yes.</p> <p>15 A. Okay. Let me just --</p> <p>16 Q. No. I'm sorry. This is the exhibit you were</p> <p>17 on.</p> <p>18 A. Oh, it's the same exhibit.</p> <p>19 Okay. So which one was it? I'm --</p> <p>20 Q. The one you were on.</p> <p>21 Produce a copy of any web browser history</p> <p>22 showing all pages you visited from each web browser on</p> <p>23 any electronic device you used on February 14th to --</p> <p>24 2018 to February 15th, 2018, concerning searches or</p> <p>25 pages related to the challenged publication, the</p>	<p style="text-align: right;">137</p> <p>1 A. I don't -- I don't know the answer to that.</p> <p>2 Q. Okay. So --</p> <p>3 (Sotto voce conversation between Mr. Ogden</p> <p>4 and Mr. Bankston.)</p> <p>5 MR. BANKSTON: There it is right there.</p> <p>6 Q. (By Mr. Ogden) So when it comes to the</p> <p>7 company's efforts to preserve evidence for this case,</p> <p>8 Topic No. 7 in the notice of deposition, you would not</p> <p>9 be prepared to discuss any of the preservation of web</p> <p>10 browsing history, because the only thing that you did</p> <p>11 was talk to Mr. Daniels?</p> <p>12 A. Yes.</p> <p>13 MR. OGDEN: We can take a break.</p> <p>14 THE VIDEOGRAPHER: We are off the record</p> <p>15 at 11:57.</p> <p>16 (Recess from 11:57 a.m. to 12:12 p.m.)</p> <p>17 THE VIDEOGRAPHER: We are back on the</p> <p>18 record at 12:12.</p> <p>19 Q. (By Mr. Ogden) Give you Exhibit 6.</p> <p>20 (Exhibit 6 marked.)</p> <p>21 A. Oh, and I don't know if you want the names of</p> <p>22 the three writers, but I could give that to you, if you</p> <p>23 want them.</p> <p>24 Q. (By Mr. Ogden) Over here. Go ahead.</p> <p>25 A. So it's Adan, Kellan, and Jaimie. I did not</p>

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<p style="text-align: right;">138</p> <p>1 speak to Kellan and Jaimie, though.</p> <p>2 Q. Jaimie a boy or a girl?</p> <p>3 A. He's male.</p> <p>4 Q. Exhibit 6.</p> <p>5 We're gonna look at Interrogatory No. 6.</p> <p>6 It's on Page 3.</p> <p>7 A. Okay.</p> <p>8 Q. Okay. It says, list every occasion and every</p> <p>9 medium by which any employee or agent of Infowars</p> <p>10 publically posted a link, shared, or otherwise</p> <p>11 referenced the article in question.</p> <p>12 Do you understand what that request is</p> <p>13 for?</p> <p>14 A. Yes. I think you're -- you're asking for</p> <p>15 whether or not the company or an employee for the</p> <p>16 company posted the original article about Mr. Fontaine,</p> <p>17 correct?</p> <p>18 Q. It's asking for a list of any time that that</p> <p>19 post was made, shared, or referenced.</p> <p>20 A. Okay.</p> <p>21 Q. Okay. And the answer is kind of long, so I'll</p> <p>22 go slow.</p> <p>23 Answer: As set forth in its general</p> <p>24 response above, Infowars, LLC does not engage in any</p> <p>25 business, has no employees, and did not publicly discuss</p>	<p style="text-align: right;">140</p> <p>1 Q. Okay. So the only place that Free Speech</p> <p>2 Systems published the article with Mr. Fontaine's</p> <p>3 picture was Mr. Daniels' article -- on Infowars dot com,</p> <p>4 correct?</p> <p>5 A. Yes. So that's what this answer is saying,</p> <p>6 yes.</p> <p>7 Q. Okay.</p> <p>8 MR. OGDEN: I don't have a Tab 7.</p> <p>9 MR. BANKSTON: What do you mean? Tab 7 is</p> <p>10 this. We took it out, remember?</p> <p>11 MR. OGDEN: Oh, that's right.</p> <p>12 MR. BANKSTON: So you just need to go</p> <p>13 there.</p> <p>14 MR. OGDEN: Yeah. You're right.</p> <p>15 Q. (By Mr. Ogden) Okay. This is gonna be Exhibit</p> <p>16 No. 7.</p> <p>17 (Exhibit 7 marked.)</p> <p>18 Q. (By Mr. Ogden) Gonna be two pages. Excuse</p> <p>19 me -- one page.</p> <p>20 Here's a copy.</p> <p>21 Okay. Have you ever seen this document?</p> <p>22 A. I believe I saw this in the materials that I</p> <p>23 reviewed. So, yes.</p> <p>24 Q. Okay. And can you describe for the jury what</p> <p>25 this document is?</p>
<p style="text-align: right;">139</p> <p>1 or post a link to the article in question, and thus does</p> <p>2 not have in its possession, custody, or control</p> <p>3 information responsive to this interrogatory.</p> <p>4 Free Speech Systems, LLC published a link</p> <p>5 to the challenged publication on the Infowars dot com</p> <p>6 website on February 14th, 2018. The challenged</p> <p>7 publication was also scraped to NewsWars dot com, but</p> <p>8 Free Speech does not believe that version of the article</p> <p>9 published on the site contained the image of</p> <p>10 Mr. Fontaine, parentheses, because the web archive does</p> <p>11 not contain a version of the article with the image, end</p> <p>12 parentheses.</p> <p>13 Kit Daniels shared a link to the</p> <p>14 challenged publication on his work-related Twitter</p> <p>15 account and his work-related Facebook page on</p> <p>16 February 14th, 2018. Free Speech Systems, LLC does not</p> <p>17 have any records of whether or not a link to the</p> <p>18 challenged publication was -- was posted on social media</p> <p>19 accounts maintained by Free Speech Systems, LLC,</p> <p>20 parentheses, including Twitter and Facebook, end</p> <p>21 parentheses, since those platforms, without notice to or</p> <p>22 consent from Free Speech Systems, LLC removed all Free</p> <p>23 Speech Systems -- Free Speech Systems, LLC's content.</p> <p>24 Did I read that correctly?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">141</p> <p>1 A. This appears to be a post on social media, not</p> <p>2 sure which, it might be Facebook or Twitter. And it's</p> <p>3 replying to at the Real Donald Trump at CNN and at</p> <p>4 MSNBC. And the commentary is shooter was a communist,</p> <p>5 with a photograph of Mr. Fontaine on the right and an</p> <p>6 advertisement for Trump 2020 on the left.</p> <p>7 Q. Okay. Gonna hand you Exhibit 8.</p> <p>8 (Exhibit 8 marked.)</p> <p>9 Q. (By Mr. Ogden) So when you click on the images</p> <p>10 in Exhibit 7, this is the full picture of Exhibit 8,</p> <p>11 which is a screenshot.</p> <p>12 You would agree?</p> <p>13 And I take that as look at the top right</p> <p>14 of the document. You can see a cell phone battery,</p> <p>15 time, all that good stuff.</p> <p>16 A. Yes, I see that. But I guess I don't</p> <p>17 understand what you're saying.</p> <p>18 Is if I click on a link on Exhibit 7, it</p> <p>19 will link me to Exhibit 8?</p> <p>20 Q. No. Exhibit 7 is two photographs.</p> <p>21 A. Right.</p> <p>22 Q. Okay. If you click on either of them, you can</p> <p>23 see the entire photograph.</p> <p>24 A. Okay. Yes. Yes.</p> <p>25 Q. Okay. And so you understand Exhibit 8 would be</p>

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<p style="text-align: right;">142</p> <p>1 enlarging the -- the picture on the right of Exhibit 7?</p> <p>2 A. I don't -- I don't know that that's true.</p> <p>3 Q. Okay. I'm going to represent to you that</p> <p>4 that's what we did.</p> <p>5 A. Okay.</p> <p>6 Q. Okay. And it doesn't really matter,</p> <p>7 necessarily, what the stuff at the top is of the</p> <p>8 screenshot.</p> <p>9 But if you look at the bottom of it, you</p> <p>10 can see that that picture was taken from a website.</p> <p>11 Can you read what website that is?</p> <p>12 A. Prison Planet dot com. WWW dot Prison Planet</p> <p>13 dot com.</p> <p>14 Q. Have you ever heard of Prison Planet dot com?</p> <p>15 A. Yes.</p> <p>16 Q. Who owns it?</p> <p>17 A. I believe that this -- well, actually, I'm not</p> <p>18 sure, because I know that Mr. Watson has something to do</p> <p>19 with Prison Planet dot com. So I'm not sure that he</p> <p>20 owns it or the -- personally or the company posts on</p> <p>21 that with his consent. So I'm not sure.</p> <p>22 Q. I'm gonna represent to you that the public</p> <p>23 filings show that Prison Planet dot com is owned by Free</p> <p>24 Speech Systems, LLC.</p> <p>25 A. Okay.</p>	<p style="text-align: right;">144</p> <p>1 A. You mean could I, from that article, make --</p> <p>2 click and it would redirect me?</p> <p>3 Q. Correct.</p> <p>4 To CNN or MSNBC or the Real Donald Trump?</p> <p>5 A. No. I couldn't click it. So it was -- it was</p> <p>6 just a photo.</p> <p>7 Q. Okay. Well, in the production, these two were</p> <p>8 right next to each other, correct? Or did the attorneys</p> <p>9 who gave you documents leave that one out?</p> <p>10 A. I don't remember ever seeing this in Exhibit 8.</p> <p>11 Q. If you had seen it, would it have caught your</p> <p>12 eye?</p> <p>13 A. Yes. (Nodding.)</p> <p>14 Q. Okay. So it's fair to say that this Exhibit 7</p> <p>15 was the document you did review, but Exhibit 8 was a</p> <p>16 document you did not review, correct?</p> <p>17 A. Right.</p> <p>18 Q. Okay.</p> <p>19 A. And then -- go ahead.</p> <p>20 Q. From this we can establish that there are at --</p> <p>21 there are additional posts with Mr. Fontaine's</p> <p>22 photograph that the defendants published, correct?</p> <p>23 A. I don't know.</p> <p>24 Q. And I will -- and I'll say it like this: If</p> <p>25 Exhibit 8 is rendered to be a true and accurate copy of</p>
<p style="text-align: right;">143</p> <p>1 Q. And the reason we went through the last three</p> <p>2 exhibits is we saw the interrogatory response that I</p> <p>3 read earlier the said the only place we could find that</p> <p>4 it was posted was Infowars dot com.</p> <p>5 A. Yes. I see that.</p> <p>6 Q. But then when plaintiffs actually go do a</p> <p>7 search, not with the internal documents, but just what's</p> <p>8 out in the public, we find that it was also posted on</p> <p>9 the defendant's other website.</p> <p>10 So I have to ask, what efforts were made</p> <p>11 to actually locate responsive information?</p> <p>12 A. Well, I don't -- I don't know anything about</p> <p>13 Exhibit 8. I've never seen that before, and it wasn't</p> <p>14 amongst the materials that I reviewed. So I don't know</p> <p>15 where it came from.</p> <p>16 I see what you're -- that you're</p> <p>17 representing that it was taken from Prison Planet dot</p> <p>18 com, but I don't have any independent recollection or</p> <p>19 information that that's where it came from.</p> <p>20 Q. Well, you told the jury you'd seen Exhibit 7</p> <p>21 before, right?</p> <p>22 A. Yes. I've seen this, yes.</p> <p>23 Q. And you saw it on your computer, true?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And was it a native?</p>	<p style="text-align: right;">145</p> <p>1 a Prison Planet dot com post, that would be an</p> <p>2 additional publication Defendants made that was not</p> <p>3 disclosed in their interrogatory answers, which were</p> <p>4 sworn to be a complete and accurate truth, true?</p> <p>5 A. If this, in fact, was published by Prison</p> <p>6 Planet dot com?</p> <p>7 Q. Yes.</p> <p>8 A. Yes.</p> <p>9 Q. And I will represent to you that if you went to</p> <p>10 Prison Planet dot com and tried to find this, that it's</p> <p>11 been taken down.</p> <p>12 A. Okay.</p> <p>13 Q. Do you know anybody outside of the defendants</p> <p>14 that would have access to take down posts on a website</p> <p>15 owned by Free Speech Systems?</p> <p>16 A. I don't know how -- I don't know the answer to</p> <p>17 that.</p> <p>18 Q. Okay. Do you know whether or not any</p> <p>19 preservation or searching and culling was done on the</p> <p>20 Prison Planet dot com platform?</p> <p>21 A. I don't know.</p> <p>22 Q. Other than this photo in Exhibit 8 that shows</p> <p>23 Prison Planet dot com, did you come across any other</p> <p>24 Prison Planet dot com postings or information regarding</p> <p>25 that website?</p>

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<p style="text-align: right;">146</p> <p>1 A. No. I don't recall seeing anything else by 2 Prison Planet dot com. 3 Q. In your conversations with the individuals you 4 spoke to at Free Speech Systems regarding this lawsuit 5 and evidence preservation, did any of them mention 6 Prison Planet dot com? 7 A. No. 8 Q. When you talked with Melinda about the company 9 structures and how they work, did she disseminate any 10 information to you explaining how Infowars' post can end 11 up on Prison Planet dot com? 12 A. No. Those conversations were mostly about 13 the -- the structure of the company, not necessarily all 14 the websites that we post content to. 15 Q. Do you -- sitting here today, do you have an 16 understanding of -- of how Infowars dot com, Prison 17 Planet dot com, Free Speech Systems, and all of the 18 programming at Free Speech Systems, how they're -- all 19 work together and cross-post and republish? Do you have 20 an understanding of how that works? 21 A. No. 22 Q. Okay. Based on the documents that were 23 produced by the defendants in this case that you 24 reviewed, will you agree that this document was not in 25 there?</p>	<p style="text-align: right;">148</p> <p>1 MR. OGDEN: 991. 2 MR. BANKSTON: Uh-huh. 3 MR. OGDEN: And then Exhibit 7 is a page 4 from Fontaine 00991. 5 Q. (By Mr. Ogden) This is gonna be Exhibit 9. 6 (Exhibit 9 marked.) 7 Q. (By Mr. Ogden) Okay. I've handed you 8 Exhibit 9, and we're gonna look at Interrogatory No. 3. 9 Interrogatory No. 3 says, if Free Speech 10 Systems, LLC contends there were any publications of the 11 challenged image by a nonparty on February 14th, 2018, 12 prior to the publication of the challenged image on the 13 Infowars website, identify the nonparty publisher, the 14 time of publication, and the location of the 15 publication, such as internet, URL link, newspaper, 16 television, et cetera. 17 The answer is: Free Speech Systems 18 responds that Kit Daniels visited websites on 19 February 14th, 2018, where he saw the challenged image 20 of Mr. Fontaine, parentheses, prior to the publication 21 of the challenged image on Infowars dot com, end 22 parentheses, including 4chan dot org, Twitter dot com, 23 and other websites, the identities of which he cannot 24 recall. 25 Mr. Daniels does not recall the exact</p>
<p style="text-align: right;">147</p> <p>1 A. I don't recall seeing it, so I don't -- I don't 2 know -- I don't want to say it's not in there, but I 3 don't recall seeing it. I recall seeing this photo 4 (indicating) with the picture of Mr. Fontaine and this 5 commentary underneath, R0 shooter is a commie Re, 6 whatever that means. I recall seeing that. I've seen 7 it reposted a number of times. But I don't recall 8 seeing this with the Prison Planet dot com on the 9 bottom. 10 Q. Okay. And the -- based on your testimony in 11 this line of questioning, it's fair to say that you 12 don't have any information on the viewership or any 13 analytics for Prison Planet dot com, correct? 14 A. No. I don't have analytics for that website. 15 MR. BANKSTON: Just for the record, 16 because the Bates number's obscured on here because of 17 the document. You might want to put on the record -- 18 (Sotto voce conversation between Mr. Ogden 19 and Mr. Bankston.) 20 MR. OGDEN: Sure. For the record 21 Exhibit 8 is Bates labeled Fontaine 000989. 22 Do you know what this one is? 23 MR. BANKSTON: Oh, yeah. Oh, that one 24 doesn't have -- might not -- what I think. Give me one 25 second. Oh, it is. It's 991.</p>	<p style="text-align: right;">149</p> <p>1 times he saw the challenged image on these websites on 2 February 14th, 2018, but it was after the Parkland 3 shooting was reported and before the publication of the 4 challenged image on the Infowars dot com website. 5 Did I read that correctly? 6 A. Yes. 7 Q. Okay. Please tell the jury what efforts were 8 made to preserve the sources that Mr. Daniels allegedly 9 relied on? 10 A. You mean did we go back to 4chan, Twitter, and 11 other websites, the identities of which Mr. Daniels 12 cannot recall, to preserve what he saw? Is that what 13 the question is? 14 Q. Yes. 15 A. We did not do that. 16 Q. Okay. What did you do? Just ask Mr. Daniels? 17 A. We asked -- asked Mr. Daniels what his basis 18 for the post was or the article, using the photograph in 19 his article, and he told us. 20 We don't traditionally maintain those 21 types of records. So whenever -- when we source an 22 article and we're -- you know, we don't take screenshots 23 of the original source to save for later. We'll link it 24 usually in the article, but we don't -- it's not a part 25 of our records system to preserve every single source.</p>

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<p>150</p> <p>1 Q. Did you link it here?</p> <p>2 A. He did not link it, no.</p> <p>3 Q. Okay. So Mr. Daniels' behavior in this case</p> <p>4 was abnormal?</p> <p>5 A. I -- I think I would agree with that. He saw</p> <p>6 a -- some pictures on social media; it had been</p> <p>7 circulating. In his opinion, he had seen it in a number</p> <p>8 of places and that was adequate sourcing.</p> <p>9 Q. At the time of this post, who was in</p> <p>10 Mr. Daniels' position -- his current -- Mr. Daniels'</p> <p>11 current position as a supervisor role?</p> <p>12 A. Right.</p> <p>13 Q. Who was the supervisor at that time?</p> <p>14 A. Kurt Nimmo.</p> <p>15 Q. Kurt Nimmo.</p> <p>16 So after Mr. Daniels posted this article</p> <p>17 in an abnormal way that was not standard operating</p> <p>18 procedure, we'll call it, he was promoted, correct?</p> <p>19 A. Promoted in the sense that he currently is a</p> <p>20 supervisor?</p> <p>21 Q. Well, before he posted it, the -- let's say</p> <p>22 this: When he woke up on February 14th, he wasn't a</p> <p>23 supervisor, correct?</p> <p>24 A. Right.</p> <p>25 Q. And then when he woke up this morning, he was</p>	<p>152</p> <p>1 case, and I don't want to say that it happened.</p> <p>2 Q. I'm not asking if it happened in this case.</p> <p>3 I'm asking if your understanding is,</p> <p>4 typically, when someone's promoted to a supervisor role,</p> <p>5 there's a pay increase?</p> <p>6 A. I don't know.</p> <p>7 Q. Okay. If -- I'll let that answer stand for the</p> <p>8 jury.</p> <p>9 On February 26th of 2018, you would agree</p> <p>10 Mr. Daniels' web browsing history was -- existed?</p> <p>11 A. On what date?</p> <p>12 Q. Excuse me.</p> <p>13 On February 26th, 2018, you would agree</p> <p>14 with me that Mr. Daniels' web browsing history from</p> <p>15 February 14th still existed, true?</p> <p>16 A. I don't know. I don't know how often he</p> <p>17 cleared -- clears his web browser history.</p> <p>18 Q. So you would not be prepared to discuss the</p> <p>19 evidence perseveration on that specific topic or</p> <p>20 question?</p> <p>21 A. No.</p> <p>22 Q. Okay. Are you aware of any steps that the</p> <p>23 defendants took to preserve Mr. Daniels' web browsing</p> <p>24 history?</p> <p>25 A. Aside from what I've already testified to, no.</p>
<p>151</p> <p>1 the supervisor, right?</p> <p>2 A. Yes.</p> <p>3 Q. That's a promotion, correct?</p> <p>4 A. Yes.</p> <p>5 Q. So he was rewarded for what he does for the</p> <p>6 company and promoted into a -- a more important role,</p> <p>7 correct?</p> <p>8 A. I don't think he was promoted because of this,</p> <p>9 but he has been promoted, yes.</p> <p>10 Q. Okay.</p> <p>11 A. I can't say as to why.</p> <p>12 Q. Other than the subject post that Mr. Daniels</p> <p>13 made on February 14th, 2018, have any other Infowars</p> <p>14 employee -- or, excuse me -- Free Speech Systems</p> <p>15 employees made defamatory posts and then been promoted?</p> <p>16 A. I don't know.</p> <p>17 Q. Did you ask why Mr. Daniels was promoted?</p> <p>18 A. No.</p> <p>19 Q. Did he get a pay raise?</p> <p>20 A. I don't know.</p> <p>21 Q. You would agree, typically, when you're</p> <p>22 promoted you get a pay raise?</p> <p>23 A. Not necessarily.</p> <p>24 Q. Okay. Okay. But typically?</p> <p>25 A. I -- I don't know whether it happened in this</p>	<p>153</p> <p>1 Q. Which you've testified to nothing.</p> <p>2 A. No.</p> <p>3 Q. Correct?</p> <p>4 A. That's not accurate.</p> <p>5 I testified that we requested that</p> <p>6 Mr. Daniels review his computer and his phone to get the</p> <p>7 material, and he did so.</p> <p>8 Q. When?</p> <p>9 A. I don't know when. It would have been sometime</p> <p>10 after we received your letter.</p> <p>11 Q. Okay. Could have been a month ago? Could have</p> <p>12 been a year ago? Could have been two years ago?</p> <p>13 A. I don't know.</p> <p>14 MR. BANKSTON: Who instructed him?</p> <p>15 Q. (By Mr. Ogden) Okay. Who instructed him?</p> <p>16 A. I'm not sure exactly who he spoke to.</p> <p>17 Q. So your information on this is purely just</p> <p>18 Mr. Daniels telling you that someone told him to -- at</p> <p>19 some point that we just don't know, instructed him to</p> <p>20 preserve his web browsing history?</p> <p>21 A. It's based on my communications with</p> <p>22 Mr. Daniels, yes.</p> <p>23 Q. Did you ask anybody else?</p> <p>24 A. About who preserved -- if -- or what</p> <p>25 preservation efforts were made for the -- for the</p>

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<p>154</p> <p>1 browser history specifically?</p> <p>2 Q. Correct.</p> <p>3 A. No. Because he was the only one that would</p> <p>4 have had access to that. He would have been -- he was</p> <p>5 the one that was asked to preserve that.</p> <p>6 Q. Right. But you were tasked with discussing</p> <p>7 what the company did to preserve, right?</p> <p>8 A. Right. And --</p> <p>9 Q. So what did the company do?</p> <p>10 A. We asked Mr. Daniels.</p> <p>11 Q. Who is we?</p> <p>12 A. The company -- I'm not sure who individually</p> <p>13 representing the company. But the company asked</p> <p>14 Mr. Daniels to preserve his -- to go through his</p> <p>15 materials.</p> <p>16 Q. Do you -- do you know who -- who from -- how do</p> <p>17 you know that it was the company that asked him?</p> <p>18 A. You mean do I think it was a lawyer who asked</p> <p>19 him?</p> <p>20 Q. I'm asking you why you keep saying the company</p> <p>21 did this, but you have no idea who that person is.</p> <p>22 A. I just don't know who exactly asked him.</p> <p>23 Q. But somebody from the company?</p> <p>24 A. (Nodding.)</p> <p>25 Q. You're 100 percent certain on that and not</p>	<p>156</p> <p>1 A. I don't know that he was asked specifically</p> <p>2 what to preserve. I think he was asked to go through</p> <p>3 his phone and his computer to preserve information</p> <p>4 related to Mr. Fontaine. I don't know that it was</p> <p>5 specified what -- what to preserve.</p> <p>6 Q. Is that concerning to you that --</p> <p>7 A. I don't --</p> <p>8 Q. -- somebody said, we need you to go preserve</p> <p>9 all this; we're not gonna tell you what, but you need to</p> <p>10 preserve it?</p> <p>11 A. Like I said, I don't know if it was</p> <p>12 communicated to him what to preserve.</p> <p>13 Q. Again, same question: Isn't that very</p> <p>14 concerning, sitting here where you are right now?</p> <p>15 A. No. I don't know that it didn't happen. It</p> <p>16 could have happened. I just don't know whether it</p> <p>17 happened or not.</p> <p>18 Q. Sure. And it -- it could -- just as well could</p> <p>19 have not happened, right?</p> <p>20 A. Sure.</p> <p>21 Q. Because you're guessing?</p> <p>22 A. I'm not guessing. I'm just saying I don't</p> <p>23 know.</p> <p>24 Q. Any time you say it could have happened, let's</p> <p>25 be honest with each other, we know what that means,</p>
<p>155</p> <p>1 guessing?</p> <p>2 A. I -- I don't know who talked to him. I</p> <p>3 don't -- I -- as I said, I don't know who asked him to</p> <p>4 do it.</p> <p>5 Q. So you don't know what the company did or</p> <p>6 didn't do? You don't know if the company was the one</p> <p>7 who asked him, true?</p> <p>8 A. I don't know who -- who -- who asked him.</p> <p>9 Q. Right. So you don't know what the company did</p> <p>10 to -- to preserve this?</p> <p>11 MS. BLOTT: Objection; asked and answered.</p> <p>12 MR. OGDEN: It's been asked. I will agree</p> <p>13 with that.</p> <p>14 A. I've answered to the best of my knowledge that</p> <p>15 I do not know who asked him.</p> <p>16 Q. (By Mr. Ogden) Okay.</p> <p>17 MR. BANKSTON: She keeps saying that I</p> <p>18 told him --</p> <p>19 (Sotto voce conversation between Mr. Ogden</p> <p>20 and Mr. Bankston.)</p> <p>21 MR. OGDEN: Yeah.</p> <p>22 Q. (By Mr. Ogden) Yeah. You mentioned that</p> <p>23 Mr. Daniels was told by someone, either with the company</p> <p>24 or not, to preserve his emails and some other items,</p> <p>25 correct?</p>	<p>157</p> <p>1 right?</p> <p>2 A. I don't understand your question.</p> <p>3 Q. It means you have no idea.</p> <p>4 A. That's exactly what I said. I don't know what</p> <p>5 was communicated to him on what to preserve or if there</p> <p>6 was direction given to him. I don't know, because I</p> <p>7 don't know who communicated it to him.</p> <p>8 Q. Right. And you did nothing to find out who</p> <p>9 communicated it, true?</p> <p>10 A. I don't know who communicated it, no.</p> <p>11 Q. I didn't say that.</p> <p>12 I said you, as the corporate</p> <p>13 representative tasked with this topic, did nothing to</p> <p>14 find out who made this direction to Mr. Daniels or what</p> <p>15 they actually told Mr. Daniels to do, correct?</p> <p>16 A. No, not correct. I believe I asked, but I</p> <p>17 don't think I got a reply or a response or nobody knew</p> <p>18 for sure. So...</p> <p>19 Q. Who did you ask?</p> <p>20 A. I asked Mr. Daniels. I don't think that he</p> <p>21 remembered.</p> <p>22 Q. Okay. And you said you didn't get a reply.</p> <p>23 Was that by text or email?</p> <p>24 A. No. I spoke to Mr. Daniels in person.</p> <p>25 Q. Okay. And then he said, I'll get back to you?</p>

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<p style="text-align: right;">158</p> <p>1 A. No. He doesn't know. I don't think he knows 2 who communicated it to him. 3 Q. Well, you said you didn't get a reply. 4 A. I think I asked, and the response was -- 5 Q. You did or you didn't? 6 Not you thought. 7 A. The response I got was that he didn't remember. 8 Q. Okay. Did you talk to Mr. Nimmo? 9 A. I did not talk to Mr. Nimmo, no. 10 Q. Did you try? 11 A. I think I -- we talked earlier about I asked 12 Melinda to try to get his number, and I don't -- and she 13 couldn't get it or she didn't have it, so I was not able 14 to talk to him. 15 Q. Okay. Did you talk to Mr. Jones? 16 A. I've spoken to Mr. Jones, yes. 17 Q. Okay. About this specifically? 18 A. About preservation of this -- of this 19 particular article and anything related to it, no. 20 Q. Okay. About -- and did you talk to anybody at 21 Free Speech Systems as to who made the decision to 22 instruct Mr. Daniels to preserve evidence? 23 A. I think what my testimony was, was that I asked 24 Mr. Daniels and he wasn't sure. But aside from that, 25 no.</p>	<p style="text-align: right;">160</p> <p>1 Q. One thing: Did you -- what'd you do to try to 2 find that out? 3 A. I didn't -- I don't -- I didn't do anything to 4 ask where this came from. 5 Q. Okay. Do you know when this was saved or 6 preserved? 7 A. No. I don't know how it came to be in the 8 files. 9 Q. One thing we can agree on that you do know is 10 that this is the photo that was posted in the original 11 article by Mr. Daniels, correct? 12 A. Yes. 13 Q. Were there any other photographs of 14 Mr. Fontaine in the original article? 15 A. No. It was just this one. 16 Q. How do you know? 17 A. Based on my conversations with Mr. Daniels. 18 Q. Okay. Other than based on the conversations 19 with the individual who made the defamatory post, how 20 else, if at all -- do you know where this photo -- or if 21 any other photos were in the original post Mr. Daniels 22 made? 23 A. Well, I can't -- I don't have the original 24 post, so I couldn't look at the original post. So I 25 asked Mr. -- Mr. Daniels, and it was this was the only</p>
<p style="text-align: right;">159</p> <p>1 Q. Okay. This is gonna be Exhibit 10. 2 (Exhibit 10 marked.) 3 Q. (By Mr. Ogden) We went over this photo a little 4 bit previously. 5 You've seen this photo, correct? 6 A. Yes. 7 Q. And the Bates label at the bottom, DEFS, dash, 8 000106 would identify to you that it has been -- that 9 was in the production the defendants gave to plaintiffs 10 in this case, correct? 11 A. Yes. 12 Q. Okay. Where'd this photo come from? 13 A. I'm unable to tell just by looking at this 14 document its origin. 15 Q. Okay. Where was this located in -- in 16 Infowars' files? 17 A. I don't know. 18 Q. Who -- 19 A. There's no way to tell. 20 Q. Who was tasked with searching and pulling out 21 things like this from Infowars' system? 22 A. Like I said, I don't know where this came from, 23 so I don't know whether it was in our system, whether it 24 was online, whether we got it on the internet. I -- I 25 don't know where it came from. So...</p>	<p style="text-align: right;">161</p> <p>1 photo -- or I believe it's the only photo, and there was 2 the commentary saying that he -- this is the alleged 3 shooter. 4 Q. Okay. 5 A. I think there was also another photo of 6 Mr. Cruz. 7 Q. How do you know that? 8 A. Because the subsequent version of the article 9 still contained a photo of Mr. Cruz. 10 Q. You say still contained, but you don't know if 11 it was contained in the original post, because you've 12 never seen it, correct? 13 A. Well, I've never seen it; that's correct. 14 But when I asked Mr. Daniels, his position 15 was the only thing that he did to change the article 16 once it had been up for however many hours it was up was 17 to remove the photo and the -- the commentary related to 18 the photo. 19 MR. BANKSTON: No. Don't worry about it. 20 No. 21 Q. (By Mr. Ogden) Was there any text included that 22 was taken out of the original post? 23 A. Yes. I believe -- from what my conversation 24 with Mr. Daniels was that the comment related to this is 25 an alleged picture of the -- of the shooter was removed.</p>

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<p style="text-align: right;">162</p> <p>1 Q. Anything else?</p> <p>2 A. Aside from that, I don't know.</p> <p>3 Q. Okay.</p> <p>4 A. But --</p> <p>5 Q. Did you ask anyone?</p> <p>6 A. Anyone else aside from Mr. Daniels?</p> <p>7 Q. Did you ask Mr. Daniels?</p> <p>8 A. When I asked Mr. Daniels, he told me that he</p> <p>9 removed the photo and he removed the reference to the</p> <p>10 photo.</p> <p>11 Q. What did you ask him specifically?</p> <p>12 A. What he did to mitigate the post once it came</p> <p>13 to his attention that it was not accurate.</p> <p>14 Q. Okay. This is gonna be Exhibit 11.</p> <p>15 (Exhibit 11 marked.)</p> <p>16 Q. (By Mr. Ogden) Have you ever seen Exhibit 11?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. When?</p> <p>19 A. When I was reviewing the Fontaine document</p> <p>20 sometime in the last week.</p> <p>21 Q. All right. Since -- can you -- can you please</p> <p>22 tell the jury when this was posted?</p> <p>23 A. You mean -- you want me to read the date?</p> <p>24 Q. Date and time.</p> <p>25 A. It says February 14th, 2018, 17:50:12.</p>	<p style="text-align: right;">164</p> <p>1 of the defendants?</p> <p>2 A. No.</p> <p>3 Q. Okay. Do you -- is this document -- is this --</p> <p>4 is Defendants 006, is that the post that was used for</p> <p>5 Mr. Daniels off of 4chan?</p> <p>6 A. I don't know.</p> <p>7 Q. Okay. Did you take any steps to figure out</p> <p>8 what this was?</p> <p>9 A. I didn't talk to Mr. Daniels about this</p> <p>10 particular document.</p> <p>11 Q. Okay. I'm gonna represent to you that this is</p> <p>12 a post from 4chan.</p> <p>13 A. Okay.</p> <p>14 Q. And if it is a post from 4chan and Mr. Daniels</p> <p>15 pulled the image from 4chan, wouldn't that be something</p> <p>16 you wanted to talk about with him?</p> <p>17 A. He -- I don't think it's accurate to say he</p> <p>18 pulled the image only from 4chan. I think his response</p> <p>19 was he saw the image on 4chan as well as other social</p> <p>20 media sources. So I don't know that this was the post</p> <p>21 that he saw necessarily.</p> <p>22 Q. Where did Mr. -- where did Mr. Daniels pull the</p> <p>23 post that he used in his article?</p> <p>24 A. As his representation in the production was and</p> <p>25 his similar comment to me was he saw it on social media</p>
<p style="text-align: right;">163</p> <p>1 Q. Okay. And at bottom right-hand corner, you see</p> <p>2 that it's marked Defendants 00006?</p> <p>3 A. Yes.</p> <p>4 Q. Which would mean that it was produced by the</p> <p>5 defendants, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. You would -- why would the defendants</p> <p>8 produce this to us?</p> <p>9 A. I don't know how it came to be in our</p> <p>10 possession, so I don't know.</p> <p>11 Q. Okay. Do you know anything about this -- the</p> <p>12 history of this document?</p> <p>13 A. No. This isn't -- wasn't produce -- produced</p> <p>14 by us in the sense that this is a post that we made.</p> <p>15 So, no.</p> <p>16 Q. Who made this post that we're looking at?</p> <p>17 A. It looks like a post by somebody posting on a</p> <p>18 chat room, so to speak.</p> <p>19 Q. Okay. How was it found?</p> <p>20 A. I don't know.</p> <p>21 Q. When was it found?</p> <p>22 A. I don't know how it came to be in our</p> <p>23 possession, so I don't know.</p> <p>24 Q. When you got this document, did it confuse you</p> <p>25 a little bit that -- as to why it was in the possession</p>	<p style="text-align: right;">165</p> <p>1 first -- I think he said Twitter. I think that's what</p> <p>2 it says in the production -- in the responses -- and he</p> <p>3 also saw it on 4chan. I don't know whether this was the</p> <p>4 particular document he saw on 4chan. But when I spoke</p> <p>5 to him, he said he had seen it, not first on 4chan, but</p> <p>6 on a social media site, such as -- I believe Twitter.</p> <p>7 Q. Okay. So we're not really -- you know, what I</p> <p>8 got out of all that is we're not a hundred percent sure</p> <p>9 why this exists in Infowars' files, correct?</p> <p>10 A. That's right.</p> <p>11 Q. Okay. And we didn't really take any steps to</p> <p>12 figure out what it is, why, when, how it came about,</p> <p>13 anything, right?</p> <p>14 A. I didn't ask him about this, no.</p> <p>15 Q. You didn't ask anyone?</p> <p>16 A. No.</p> <p>17 Q. Okay. Does any Info- -- do defendants have the</p> <p>18 ability to provide information any time a post is put up</p> <p>19 on the internet on its website?</p> <p>20 A. I'm sorry. Can you repeat that.</p> <p>21 Q. Is it documented in Infowars' system when a</p> <p>22 post is put up on its web page?</p> <p>23 A. I guess I don't understand the question.</p> <p>24 So if a -- you mean if there's a post --</p> <p>25 like an article --</p>

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<p style="text-align: right;">166</p> <p>1 Q. Yeah. Sure.</p> <p>2 A. -- and when that is up -- posted to the</p> <p>3 website?</p> <p>4 Q. Yes.</p> <p>5 A. Okay. So, yes, I think that what -- what would</p> <p>6 happen is, if you post the article, the -- the time</p> <p>7 would be posted.</p> <p>8 Q. Okay. And if you alter the article, what's the</p> <p>9 time say at the top?</p> <p>10 A. Oh, you know what, I don't know. I don't know</p> <p>11 if the time gets changed.</p> <p>12 Q. Okay. Because that's kind of an important</p> <p>13 detail, correct?</p> <p>14 A. As to the time that the original post --</p> <p>15 article was uploaded?</p> <p>16 Q. As to the time that's at the top of the web</p> <p>17 page that we have available to us today.</p> <p>18 A. Well, that's not the original article.</p> <p>19 Q. I know.</p> <p>20 A. Right.</p> <p>21 Q. But is that the original time?</p> <p>22 A. I don't know the answer to that.</p> <p>23 Q. What time was the article originally posted?</p> <p>24 A. Based on my conversation with Kit Daniels, he</p> <p>25 says it was posted sometime in the late afternoon around</p>	<p style="text-align: right;">168</p> <p>1 Q. Okay. What time is that?</p> <p>2 A. He would have left around 5:00.</p> <p>3 Q. Do employees clock in and clock out?</p> <p>4 A. I don't know around this time whether they were</p> <p>5 clocking in or clocking out.</p> <p>6 Q. Did you look?</p> <p>7 A. Did I ask if people were clocking in and</p> <p>8 clocking out?</p> <p>9 Q. Did you -- yeah. Did you try -- did you look</p> <p>10 for any information to ascertain when Mr. Daniels left?</p> <p>11 A. I don't know that the company has such</p> <p>12 information.</p> <p>13 Q. You didn't look either.</p> <p>14 A. No, I didn't.</p> <p>15 Q. My question is whether or not you looked.</p> <p>16 A. No.</p> <p>17 Q. Okay. This is gonna be Exhibit 12.</p> <p>18 (Exhibit 12 marked.)</p> <p>19 Q. (By Mr. Ogden) Have you seen Exhibit 12?</p> <p>20 A. I -- I don't think so.</p> <p>21 Q. Really?</p> <p>22 A. It doesn't look familiar.</p> <p>23 Q. Okay. Well, I'm gonna represent to you that</p> <p>24 this is a screenshot or a screen capture on Infowars</p> <p>25 internal system.</p>
<p style="text-align: right;">167</p> <p>1 4:00 o'clock.</p> <p>2 Q. Okay. So we don't know?</p> <p>3 A. I can give you an about time that it was</p> <p>4 posted.</p> <p>5 Q. That sounds like a guess.</p> <p>6 Wouldn't you agree?</p> <p>7 A. It's not a guess. It's based on my interview.</p> <p>8 Q. Okay.</p> <p>9 A. So it's definitely not 9:00 o'clock in the</p> <p>10 morning; I know that. And it's definitely not 7:30 or</p> <p>11 8:00 o'clock at night.</p> <p>12 Q. What about 3:00?</p> <p>13 A. In the afternoon?</p> <p>14 Q. Yeah. What about 5:00?</p> <p>15 A. I don't know how late it was posted. It was in</p> <p>16 the afternoon.</p> <p>17 Q. 7:00?</p> <p>18 A. I don't think it was posted that late, because</p> <p>19 it was before Kit left in the afternoon.</p> <p>20 Q. What time does the afternoon end?</p> <p>21 A. To me, it would end before someone left in the</p> <p>22 evening time.</p> <p>23 Q. Not to you, to the company.</p> <p>24 A. He would have left his office at the end of</p> <p>25 business hours.</p>	<p style="text-align: right;">169</p> <p>1 And if you look at it, the name of the</p> <p>2 post -- the ID of the post is 479629.</p> <p>3 See where it says that?</p> <p>4 A. Yes.</p> <p>5 Q. Then it says the name of the post is, report,</p> <p>6 Florida shooter inspired by Isis Allahu Akbar.</p> <p>7 You see that?</p> <p>8 A. Yes.</p> <p>9 Q. If you go up one line, it post status.</p> <p>10 What's it say right next to that?</p> <p>11 A. You mean under that?</p> <p>12 Q. Next to it?</p> <p>13 A. Post modified.</p> <p>14 Q. Post modified.</p> <p>15 Under that it says a time.</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So this tells us exactly when the post</p> <p>18 was modified, correct?</p> <p>19 A. That's what it says.</p> <p>20 Q. Okay. And that's April 2nd, 2018.</p> <p>21 So that's when I represented to you</p> <p>22 earlier when the retrac- -- the proper retraction was</p> <p>23 made the day after this lawsuit was filed.</p> <p>24 Do you remember that?</p> <p>25 A. I know we talked about that date, but that</p>

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<p style="text-align: right;">170</p> <p>1 doesn't represent all the times this article was 2 modified. 3 Q. You're right. Thank you for that. 4 Please tell the jury why we don't have one 5 of these for every other modification. 6 A. Because I don't know that we saved that 7 information. 8 Q. Why would you save this one? 9 A. I don't know. 10 Q. Okay. So the -- the answer to my question of 11 why we don't have one of these for every single time 12 this article was published and then modified is because 13 you just don't know? 14 A. Well, I don't know when in relationship to the 15 time we received your notification it was modified. I 16 know it was modified on the 15th, and then we wouldn't 17 have necessarily saved that information because we 18 didn't get the letter yet. And then it was modified 19 after that on this date, as well. I don't know if it 20 was modified again before that. 21 But at least as far as the 2/15 22 modification, I can say that we wouldn't have saved this 23 because we weren't aware that it needed to be saved. 24 Q. When -- or, actually, what -- what question 25 were you just answering?</p>	<p style="text-align: right;">172</p> <p>1 Q. Are they auto deleted or does somebody go in 2 cache, if you know? 3 A. I don't know. 4 Q. Okay. What program sets this up? 5 A. I don't know the name of it. 6 Q. Okay. Does it happen -- does it happen 7 immediately after, or is there a delay after the article 8 goes live? Or does this -- is this generated 9 immediately, if you know? 10 A. You mean is this date -- is this time -- 11 Q. Was this document -- 12 A. Uh-huh. 13 Q. -- created at this exact time that's listed on 14 it, or do you know? 15 A. Oh, when was the document created? 16 I don't know when this document was 17 created. 18 Q. Okay. 19 A. No. 20 Q. Who has access to the system that generates 21 this information? 22 A. I don't know -- 23 Q. Okay. 24 A. -- the name of the person. 25 Q. Right. And so when you say we -- we -- the</p>
<p style="text-align: right;">171</p> <p>1 A. You asked me why you don't have -- 2 Q. No. 3 A. -- this document for every modification. 4 Q. That's not -- that's not what I asked. 5 A. Okay. 6 Q. Which is why I was sitting here with my arms 7 crossed, confused as to what you were talking about for 8 that long. 9 If you'll listen to my question, they're 10 not hard. Most of them can be answered with a yes or 11 no. I get that you want to advocate for your -- for 12 the, you know, company you represent here today. You 13 don't have to. If Ms. Blott wants to ask you questions 14 when I'm done, I'm -- she's free to do so. 15 A. Do you want to reask your question? 16 Q. I'd love to. 17 The reason we don't have a post -- a 18 document like document Defendants 0025 is because you 19 don't know. 20 A. No. No. As in I'm not agreeing with your 21 question. 22 Q. Okay. How long does Infowars save these? 23 A. I don't -- I don't know the answer to that. 24 Q. Are they -- 25 A. I don't know that they are saved.</p>	<p style="text-align: right;">173</p> <p>1 original post and modification were on 2/15, so we don't 2 have those. 3 You have no idea, do you? 4 A. No. I don't -- I have an idea, and that was 5 the prior answer I was giving. 6 Q. Okay. 7 A. But... 8 Q. Ms. Paz, you just testified you've never even 9 seen this before. 10 A. No. I've never seen this. 11 Q. Okay. So -- but now all the sudden, you've got 12 all this knowledge as to when docu- -- when information 13 on this system is deleted, not deleted, whether -- 14 A. That's not what I said, sir. 15 Q. Okay. Then I'll ask my questions a little more 16 simpler. 17 Do -- the information from the system in 18 Exhibit -- 19 A. 12. 20 Q. -- 12, does Infowars have possession of the 21 same information from when the post was originally 22 posted and -- and then the first modification? 23 A. (Shaking head.) I don't believe so, no. 24 Q. Why? 25 A. Because I don't think that information gets</p>

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<p style="text-align: right;">174</p> <p>1 saved.</p> <p>2 Q. I'm not asking you what you think; I'm asking</p> <p>3 what you know.</p> <p>4 A. I don't know.</p> <p>5 Q. And I've tried very hard to be patient with you</p> <p>6 Ms. Paz. You're an attorney and you know better.</p> <p>7 Answer my questions. Don't guess. Please stop. Answer</p> <p>8 the question that's on the table and stop guessing.</p> <p>9 A. I don't know why it doesn't save that</p> <p>10 information or how it gets saved. I don't know.</p> <p>11 Q. Is it saved?</p> <p>12 A. I don't know.</p> <p>13 Q. Right. So when you're sitting here, no, I</p> <p>14 don't believe so, that's a pure pull-out-of-the-air</p> <p>15 guess, true?</p> <p>16 A. No. It's not pull-out-of-the-air guess. I'm</p> <p>17 making an educated inference based on the information</p> <p>18 that I see in this document. You asked me about the</p> <p>19 document, and you asked me what I -- about this</p> <p>20 document, and I'm getting an inference from the</p> <p>21 document.</p> <p>22 Q. Stop inferring, because that's a guess. I want</p> <p>23 to know what you know.</p> <p>24 A. I didn't ask about this document, so I don't</p> <p>25 know.</p>	<p style="text-align: right;">176</p> <p>1 Q. Okay. With that answer in mind, I want you to</p> <p>2 answer this question: Why previously did you say</p> <p>3 this -- that information no longer exists?</p> <p>4 A. Because it says the dates that are modified --</p> <p>5 the post modified and whether it was posted. It doesn't</p> <p>6 say how many times it was modified. That's why. That's</p> <p>7 the basis for my testimony.</p> <p>8 Q. I will let that answer stand for the jury.</p> <p>9 (Sotto voce conversation between Mr. Ogden</p> <p>10 and Mr. Bankston.)</p> <p>11 MR. BANKSTON: We're at 1:00. I didn't</p> <p>12 know if you wanted to take a break now. I don't</p> <p>13 remember when we took the last one.</p> <p>14 MR. OGDEN: Are you okay?</p> <p>15 THE REPORTER: Yes. Thank you.</p> <p>16 MR. OGDEN: If you just give me the look,</p> <p>17 I'll know.</p> <p>18 THE REPORTER: Okay.</p> <p>19 (Exhibit 13 marked.)</p> <p>20 Q. (By Mr. Ogden) I'm gonna hand you Exhibit 13.</p> <p>21 Have you Ever seen Exhibit 13 before?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Earlier you said that you'd only seen</p> <p>24 what I assumed was the petitions. And you said that was</p> <p>25 all that I've looked at. And now we've established that</p>
<p style="text-align: right;">175</p> <p>1 Q. I know you didn't, because you didn't know it</p> <p>2 existed until I handed it to you.</p> <p>3 A. That's right.</p> <p>4 Q. Now, my question is: Does -- does one of these</p> <p>5 exist for February 15th -- or excuse me --</p> <p>6 February 14th, 2018, that says original post?</p> <p>7 A. I don't know.</p> <p>8 Q. You don't know.</p> <p>9 Does -- does a document like this with</p> <p>10 this information exist for February 15th with the first</p> <p>11 post modified?</p> <p>12 A. I don't know.</p> <p>13 Q. Okay. Sitting here today, that information</p> <p>14 very well could be on the system, correct?</p> <p>15 A. I don't know if it gets saved on the system, so</p> <p>16 I don't know.</p> <p>17 Q. Right. You have no idea.</p> <p>18 So when you sit here and say, no, I don't</p> <p>19 believe that exists, you have -- that is a guess, and</p> <p>20 that's not accurate, true?</p> <p>21 A. I don't know what exists or what doesn't</p> <p>22 exist --</p> <p>23 Q. Exactly.</p> <p>24 A. -- or what gets saved or what doesn't get saved</p> <p>25 on this particular platform.</p>	<p style="text-align: right;">177</p> <p>1 you have seen some interrogatory answers. So let me go</p> <p>2 back and ask you again.</p> <p>3 What-all did you -- what documents did you</p> <p>4 review to prepare yourself for today?</p> <p>5 A. I think this was shown to me in connection with</p> <p>6 my conversations regarding the net worth.</p> <p>7 Q. With who?</p> <p>8 A. With Melinda, maybe.</p> <p>9 Q. Okay. And it's your testimony, sitting here</p> <p>10 today, that the conversation you had with</p> <p>11 Mr. Whittenburg did not go into the net worth?</p> <p>12 That was my understanding of your answer.</p> <p>13 A. No. I -- yeah. I didn't talk to him about the</p> <p>14 net worth.</p> <p>15 Q. Okay. Did he have information about any of the</p> <p>16 deposition topics from yesterday or today?</p> <p>17 A. Him?</p> <p>18 Q. Yes.</p> <p>19 A. I don't know what he has information about.</p> <p>20 Q. Okay.</p> <p>21 A. I can't say what he knows.</p> <p>22 Q. That's very peculiar that you spoke to him.</p> <p>23 A. I don't agree. He represents the company; I</p> <p>24 represent the company.</p> <p>25 Q. In what capacity?</p>

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<p style="text-align: right;">178</p> <p>1 A. What capacity do I represent the company?</p> <p>2 Q. Yeah.</p> <p>3 A. In connection with these depositions.</p> <p>4 MR. BANKSTON: I thought she told me she</p> <p>5 didn't.</p> <p>6 Q. (By Mr. Ogden) Yeah. I thought you said you</p> <p>7 did not represent the company. You told Mr. Bankston --</p> <p>8 A. Oh, you mean -- oh, I'm sorry. I'm sorry. I</p> <p>9 misspoke. I'm getting exhausted.</p> <p>10 I don't represent the company in a legal</p> <p>11 capacity as a lawyer. I represent the company as the</p> <p>12 corporate representative. But I don't represent the</p> <p>13 company as an attorney, no.</p> <p>14 Q. How long did you talk to Mr. Whittenburg?</p> <p>15 A. I don't know. I didn't talk to him very long.</p> <p>16 Q. After how yesterday went and how today has</p> <p>17 definitely gone, don't you think that time would have</p> <p>18 been more useful reviewing the information that you</p> <p>19 should have been reviewing?</p> <p>20 A. No.</p> <p>21 Q. Okay. And just to establish, your conversation</p> <p>22 with Mr. Whittenburg had nothing to do with any of the</p> <p>23 Infowars internal discussions about yesterday or today</p> <p>24 or any of the depo topics that were listed yesterday or</p> <p>25 today, correct?</p>	<p style="text-align: right;">180</p> <p>1 good idea?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 (Sotto voce conversation between Mr. Ogden</p> <p>5 and Mr. Bankston.)</p> <p>6 Q. (By Mr. Ogden) Yeah. I need to clear up a</p> <p>7 little thing.</p> <p>8 A. Uh-huh.</p> <p>9 Q. You told us that today you spent about 10 hours</p> <p>10 preparing for this deposition, true?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. How many total hours did you spend</p> <p>13 preparing?</p> <p>14 A. Between the two cases?</p> <p>15 Q. Yes. Since you've been hired by the defendant,</p> <p>16 how much have you spent?</p> <p>17 A. It's about -- it's around a hundred hours, not</p> <p>18 including the deposition time.</p> <p>19 Q. Okay. Because yesterday I believe the</p> <p>20 breakdown was a hundred hours of -- I thought it was --</p> <p>21 I calculated it to be like 145 hours.</p> <p>22 Is that wrong? It's just hundred hours</p> <p>23 total?</p> <p>24 A. How did you get 145?</p> <p>25 I don't recall ever saying -- saying 145.</p>
<p style="text-align: right;">179</p> <p>1 A. You mean did I talk to him in -- today or</p> <p>2 yesterday?</p> <p>3 Q. No. I'm asking --</p> <p>4 A. I'm sorry. I don't --</p> <p>5 Q. Sure.</p> <p>6 A. I didn't understand your question.</p> <p>7 Q. You had two deposition --</p> <p>8 A. Yes.</p> <p>9 Q. You had two deposition notices, correct?</p> <p>10 A. Yes.</p> <p>11 Q. One for yesterday and one for today.</p> <p>12 A. Yes.</p> <p>13 Q. And Mr. Whittenburg, did he -- did he possess</p> <p>14 knowledge on any of those topics?</p> <p>15 A. I don't know. I don't think so.</p> <p>16 Q. Okay. So my same question: Don't you think</p> <p>17 your very limited time preparing for these two</p> <p>18 depositions would have been well spent doing something</p> <p>19 actually productive to prepare you?</p> <p>20 A. No.</p> <p>21 Q. When you spoke to him, were you aware of how</p> <p>22 many documents you were tasked with reviewing?</p> <p>23 A. Yes.</p> <p>24 Q. And knowing that, you still think that having a</p> <p>25 conversation completely unrelated to these depositions was a</p>	<p style="text-align: right;">181</p> <p>1 You mean --</p> <p>2 Q. Sure.</p> <p>3 A. -- we were adding up hours?</p> <p>4 Q. I'll break it down. You gave Mr. Bankston</p> <p>5 yesterday -- do you remember saying that you spent about</p> <p>6 75 hours reviewing documents? Do you remember that?</p> <p>7 A. No. I think what I said was I spent about 35</p> <p>8 hours or so reviewing videos.</p> <p>9 Q. Yep. I got that one.</p> <p>10 A. Right. And then I spent more hours -- I can't</p> <p>11 remember what I said yesterday as far as reviewing</p> <p>12 documents. And then talking to people and et cetera. I</p> <p>13 don't think I said 75 hours reviewing documents. That's</p> <p>14 not accurate.</p> <p>15 Q. Okay. What is accurate? How many hours did</p> <p>16 you spend reviewing documents?</p> <p>17 A. It -- are we talking about all documents, the</p> <p>18 universe of documents, deposition, Bates stamps, things</p> <p>19 like that?</p> <p>20 Q. Yep.</p> <p>21 A. Maybe 45 or 50 hours plus the interviews that I</p> <p>22 did.</p> <p>23 Q. Okay. How many hours did you do spending --</p> <p>24 spend doing interviews?</p> <p>25 A. So I started interviewing people on Wednesday</p>

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<p style="text-align: right;">182</p> <p>1 through Saturday. So --</p> <p>2 Q. Yesterday you testified between that Wednesday</p> <p>3 and Saturday doing interviews was about 25 hours.</p> <p>4 A. There -- thereabouts. So eight, 16 -- 20, 25</p> <p>5 hours. I also spent on Sunday an hour interviewing</p> <p>6 Mr. Watson via Zoom.</p> <p>7 Q. Okay. So I got 50 --</p> <p>8 A. My math is terrible. I'm sorry.</p> <p>9 Q. 50 and 25 is 75 --</p> <p>10 A. Uh-huh.</p> <p>11 Q. -- plus 36 is 116?</p> <p>12 A. Okay.</p> <p>13 Q. Okay. So in 14 days, you billed 116 hours?</p> <p>14 A. It's not billable time. But can I account for</p> <p>15 116 hours, I can account for my time, yes.</p> <p>16 Q. Okay. So just breaking this down. That's 58</p> <p>17 hours -- no -- yeah -- 58 hours for week one, 58 hours</p> <p>18 week two, if we just split it in half, right?</p> <p>19 A. I don't know. My math's terrible. So I can't</p> <p>20 do that in my head.</p> <p>21 Q. Okay. So out of the, roughly, 116 hours -- and</p> <p>22 I know that's not an exact number -- you spent 106 on</p> <p>23 Sandy Hook and 10 Mr. Fontaine?</p> <p>24 A. No. The review of the documents and those</p> <p>25 hours and the time pro- -- include the Fontaine review.</p>	<p style="text-align: right;">184</p> <p>1 A. I -- I don't know if we've produced that.</p> <p>2 Q. I'm asking you -- you were tasked with --</p> <p>3 A. Do I recall --</p> <p>4 Q. Hold on.</p> <p>5 A. -- his net worth? No, I don't.</p> <p>6 Q. Let's back up. Slow down.</p> <p>7 You were tasked with the net worth of</p> <p>8 defendants in this case, correct?</p> <p>9 A. I was tasked with being -- to testify</p> <p>10 against -- to the net worth of Free Speech, because I am</p> <p>11 the corporate representative.</p> <p>12 Q. Okay. I'll back up.</p> <p>13 What is the net worth of Free Speech</p> <p>14 Systems?</p> <p>15 A. I believe we have a negative net worth.</p> <p>16 Q. I'm not asking what you believe. I'm asking --</p> <p>17 A. We have a negative net worth.</p> <p>18 Q. Okay. What is it?</p> <p>19 A. If I may refer to the profit-loss?</p> <p>20 Q. Okay. I'm gonna throw a sticker on that.</p> <p>21 A. If you want to -- sure.</p> <p>22 Q. This will be 14.</p> <p>23 (Exhibit 14 marked.)</p> <p>24 Q. (By Mr. Ogden) Couple of questions while you're</p> <p>25 reviewing it.</p>
<p style="text-align: right;">183</p> <p>1 But if you're saying did I spend 10 hours reviewing</p> <p>2 Fontaine documents specifically, and if you're gonna</p> <p>3 break it down like that, then -- in comparison, is that</p> <p>4 what the question is?</p> <p>5 Q. I got 116 hours total.</p> <p>6 A. Right.</p> <p>7 Q. Earlier you told me that in preparation for</p> <p>8 today total you spent about 10 hours on this</p> <p>9 deposition --</p> <p>10 A. Right.</p> <p>11 Q. -- on these -- on these topics.</p> <p>12 A. Right.</p> <p>13 Q. So I'll end it there. I think we're pretty</p> <p>14 clear.</p> <p>15 Do you think you're prepared for today?</p> <p>16 A. I'm prepared as I could be with the time that I</p> <p>17 was given. So, yes.</p> <p>18 (Sotto voce conversation between Mr. Ogden</p> <p>19 and Mr. Bankston.)</p> <p>20 Q. (By Mr. Ogden) Do you know when these</p> <p>21 depositions were ordered by the Court?</p> <p>22 A. No, I don't. I don't know the date. All I can</p> <p>23 tell you is when I was retained to prepare.</p> <p>24 Q. What is Ms. -- what is -- we'll start here.</p> <p>25 What is Kit Daniels' net worth?</p>	<p style="text-align: right;">185</p> <p>1 A. Sure.</p> <p>2 Q. Where'd that come from?</p> <p>3 A. As I testified earlier, I met with Melinda, who</p> <p>4 printed me the QuickBooks information.</p> <p>5 (Sotto voce conversation between Mr. Ogden</p> <p>6 and Mr. Bankston.)</p> <p>7 A. May I continue?</p> <p>8 Q. (By Mr. Ogden) Yeah. Sure.</p> <p>9 A. Sure. So I asked Melinda for the profit-loss</p> <p>10 statements through 2020. The 2021 numbers are not</p> <p>11 available yet; they're not finalized.</p> <p>12 So according to the profit-loss for the</p> <p>13 year, there is a negative net income of \$6.8 million.</p> <p>14 Q. Sitting here today, what is Infowars -- what is</p> <p>15 Free Speech Systems net worth?</p> <p>16 A. I don't -- I'm sorry. This doesn't -- this</p> <p>17 doesn't tell me the exact number. Just give me one</p> <p>18 second.</p> <p>19 MR. BANKSTON: (Inaudible.)</p> <p>20 Q. (By Mr. Ogden) What's the Bates label -- what's</p> <p>21 the Bates number on Exhibit 14?</p> <p>22 A. This doesn't have a Bates label.</p> <p>23 Q. Okay.</p> <p>24 A. This was produced to me -- and just -- this was</p> <p>25 at my request that I asked Melinda to produce this to</p>

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<p>186</p> <p>1 me.</p> <p>2 Q. When'd she give it to you?</p> <p>3 A. Friday.</p> <p>4 Q. Okay. And did you -- did you go over it with</p> <p>5 anyone after you got it?</p> <p>6 A. I went over it with -- I don't think I spoke to</p> <p>7 Melinda about it. I might have spoken to Bob about it,</p> <p>8 just asked him to explain it to me. But other than</p> <p>9 that, no.</p> <p>10 MR. BANKSTON: (Inaudible.)</p> <p>11 Q. (By Mr. Ogden) You spoke with Bob about it on</p> <p>12 Friday?</p> <p>13 A. Friday.</p> <p>14 Q. Okay. How long did y'all talk?</p> <p>15 A. An hour or so.</p> <p>16 Q. All right. That was on phone or that was in</p> <p>17 person?</p> <p>18 A. No. I saw him in person. He was at -- he was</p> <p>19 at the office.</p> <p>20 Q. Okay. So you were at the office during all</p> <p>21 this?</p> <p>22 A. Yes. I was at the office, Wednesday, Thursday,</p> <p>23 Friday, and Saturday.</p> <p>24 Q. Okay. Why did you ask for that document?</p> <p>25 A. Because I believe it was relative and -- to the</p>	<p>188</p> <p>1 second.</p> <p>2 MS. BLOTT: I didn't do it. That's my</p> <p>3 answer.</p> <p>4 MR. OGDEN: Okay. Do you believe that the</p> <p>5 information in Exhibit 14 that I just stickered is</p> <p>6 information plaintiffs are entitled to?</p> <p>7 MS. BLOTT: Yes, I do.</p> <p>8 MR. OGDEN: Okay. Let's take a short</p> <p>9 break so that we can read over what's in there.</p> <p>10 THE VIDEOGRAPHER: We are off the record</p> <p>11 at 1:14.</p> <p>12 (Recess from 1:14 p.m. to 1:29 p.m.)</p> <p>13 THE VIDEOGRAPHER: We are back on the</p> <p>14 record at 1:29.</p> <p>15 MS. BLOTT: Mr. Ogden, I need to clarify</p> <p>16 my response to the question you posed with respect to</p> <p>17 the financial document that Ms. Paz has.</p> <p>18 This document was provided on Friday, this</p> <p>19 immediately past Friday. And in my continuous review of</p> <p>20 the answers or the discovery responses by prior counsel</p> <p>21 in this case, I did not see where any profit and loss or</p> <p>22 balance sheet had been produced in response to the</p> <p>23 interrogatory that used the term financial statement.</p> <p>24 And so I reached out and learned that no,</p> <p>25 in fact, it had not been produced by prior counsel</p>
<p>187</p> <p>1 topics that I was to testify about today.</p> <p>2 Q. Okay. Did you -- were you under -- were you</p> <p>3 under the belief that that document had been produced in</p> <p>4 this litigation?</p> <p>5 A. I don't know whether this has been produced.</p> <p>6 These are the numbers for 2020. I don't know if it's</p> <p>7 been produced already.</p> <p>8 MR. OGDEN: Ms. Blott, we don't have that.</p> <p>9 MS. BLOTT: I know we don't, because the</p> <p>10 numbers were -- this is a revised one that she and I was</p> <p>11 given Friday, and I believe the revisions took place --</p> <p>12 MR. OGDEN: Can I ask you a question?</p> <p>13 MS. BLOTT: Sure.</p> <p>14 MR. OGDEN: Why didn't it come with the</p> <p>15 other 333 I got last night?</p> <p>16 MS. BLOTT: Because I was concentrating on</p> <p>17 those for the Fontaine, and I ran out of time.</p> <p>18 MR. OGDEN: Okay. Why want -- why didn't</p> <p>19 you hand it to me this morning or during the first break</p> <p>20 or the second break, or the third break?</p> <p>21 THE WITNESS: This is actually in --</p> <p>22 MR. OGDEN: I'm not asking you, Ms. Paz.</p> <p>23 THE WITNESS: It was in the binder.</p> <p>24 MR. OGDEN: That's fine. I understand you</p> <p>25 have comments. You can keep them to yourself for a</p>	<p>189</p> <p>1 because they did not consider it a financial statement,</p> <p>2 which is contrary to my professional opinion. And</p> <p>3 because of that, I did get the document so that I can</p> <p>4 supplement that discovery.</p> <p>5 MR. OGDEN: Okay. I just want to put on</p> <p>6 the record for myself and on behalf of my clients that</p> <p>7 that document has been sitting in the corporate</p> <p>8 representative's bag next to her all day without</p> <p>9 producing it to us.</p> <p>10 MS. BLOTT: It is in the binder that you</p> <p>11 have and contains another document.</p> <p>12 MR. OGDEN: What binder do we have?</p> <p>13 THE WITNESS: Yesterday. I had brought</p> <p>14 with me my binder. It was in my binder.</p> <p>15 MR. OGDEN: I don't have that.</p> <p>16 MS. BLOTT: Well, whoever has it. The</p> <p>17 court reporter has it. Somebody has it.</p> <p>18 MR. OGDEN: Did you give me a copy? Does</p> <p>19 it have a Bates number?</p> <p>20 MS. BLOTT: Yes, as a matter of fact.</p> <p>21 MR. OGDEN: What's the Bates number?</p> <p>22 MS. BLOTT: I'd have to look on my iPad.</p> <p>23 MR. OGDEN: (Inaudible.)</p> <p>24 MR. BANKSTON: (Inaudible.)</p> <p>25 MR. OGDEN: I have not produced it.</p>

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<p style="text-align: right;">190</p> <p>1 MR. BANKSTON: It hasn't been produced. 2 MS. BLOTT: It has not been formally 3 produced. 4 MR. OGDEN: We -- 5 MR. BANKSTON: It's being produced right 6 now is what we're saying, like, within the past 10 7 minutes. 8 MR. OGDEN: Yes. 9 MR. BANKSTON: Okay. 10 MR. OGDEN: Let's just -- I want to make 11 something clear. 12 When we started this depo, the topics were 13 very clear that -- that net worth was one of the topics. 14 And that document this witness testified was she -- she 15 asked for it to be prepared to discuss that topic, and 16 it's been sitting in her bag. 17 I wouldn't have a problem if I'd have 18 gotten it this morning or during any of our breaks. But 19 the fact that at the very end after -- I don't know -- 20 four or five hours of questioning, I ask the witness -- 21 we get to that topic, and then all of a sudden it comes 22 out of the -- out of the bag, and now we're saying that 23 it's been Bates labeled and it's on the way and -- you 24 know, I'm -- you can obviously probably see how it looks 25 from my seat.</p>	<p style="text-align: right;">192</p> <p>1 MR. OGDEN: -- was provided to me. And 2 it's stamped attorney's eyes only. And I don't know if 3 it was in regards to this case, the Sandy Hook cases, or 4 both. And I don't want to violate a protective order by 5 bringing it out here right now. 6 So I'm asking on the record if you'll 7 consent to us using that as an exhibit when we question 8 the witness? 9 MS. BLOTT: Yes. I will represent to you, 10 though, Mr. Ogden, just so that there is no confusion, 11 the profit and loss -- oh, wait a minute -- may I see 12 that a minute? I want to make sure -- 13 MR. OGDEN: Sure. 14 MS. BLOTT: -- that's the most recent one. 15 MR. OGDEN: That's what Mr. Whittenburg 16 gave us. 17 MS. BLOTT: Oh. Okay. So wait. Wait. 18 Before you -- okay. You haven't marked this one. 19 This was -- this is not any type of 20 balance sheet, profit and loss statement; this was 21 merely prepared for the purposes of settlement 22 negotiations. 23 MR. OGDEN: You'd agree with me, though, 24 that it has information in it that is completely 25 relevant to the net worth of the company? Yes?</p>
<p style="text-align: right;">191</p> <p>1 I'm not accusing you one way or the other. 2 But I'm just looking at, you know, the aggregate of 3 what's happened in this case with all lawyers. And 4 every lawyer has come in and told me they're not that 5 person; they're transparent; they're gonna get on it. 6 And every single time they are replaced, the new one 7 comes in and says the same thing. 8 Who did you talk to that had a different 9 professional opinion than you on the production of that 10 document so that I know who to name in my motion? 11 MS. BLOTT: Bradley Reeves. 12 MR. BANKSTON: All right. I need to make 13 a phone call. 14 MR. OGDEN: My other -- and I need to 15 clear one thing up before I go on to this line of 16 questioning. 17 A document was produced to me by 18 Mr. Whittenburg when y'all came to my office, and I 19 wanted to -- it was not clear which case he was giving 20 that to me for. 21 MS. BLOTT: The profit and loss and 22 balance sheet. So they were provided to you. Okay? 23 MR. OGDEN: A completely different one 24 with completely different numbers -- 25 MS. BLOTT: Correct.</p>	<p style="text-align: right;">193</p> <p>1 MS. BLOTT: But it's not current. 2 MR. OGDEN: I didn't ask if it was 3 current. I asked if it had information relevant to the 4 net worth of the company. 5 MS. BLOTT: Yes. 6 MR. OGDEN: Okay. 7 MS. BLOTT: At one point. 8 MR. OGDEN: Okay. With that said, is it 9 still okay if we -- 10 MS. BLOTT: No. 11 MR. OGDEN: -- talk about it with this 12 witness? 13 MS. BLOTT: No. Because it's not a 14 financial statement, per se. I don't know whether -- so 15 no. 16 MR. OGDEN: Do you know what -- the order 17 does not say financial statement, neither does my net 18 worth discovery request. 19 MS. BLOTT: Yes. It does say financial 20 statement. 21 MR. OGDEN: And so how -- I'll -- I'll -- 22 I'm gonna propose a solution, potential solution, which 23 is: We use this. We've already established -- there is 24 no protective order in this case, so I guess that's -- 25 that is an issue.</p>

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<p style="text-align: right;">194</p> <p>1 MS. BLOTT: Well, we can take care of that 2 on the record. 3 THE REPORTER: We are on the record. 4 MS. BLOTT: I know. I just realized that. 5 (Inaudible.) 6 MR. OGDEN: How would you like to take 7 care of this? 8 MS. BLOTT: I'm not gonna agree to it. 9 This was work product in preparation of settlement 10 negotiations only. 11 MR. OGDEN: That's fine. 12 MS. BLOTT: And it was provided to you 13 only for that reason. 14 MR. OGDEN: That's fine. 15 But the Rule 408 that was cited prior to 16 us engaging in that discussion in my office was directly 17 to admissibility, not the use of it in discovery. And 18 it's not work product because you gave it to me. 19 MS. BLOTT: So let's do this -- and I will 20 tell you she has not seen this. 21 MR. OGDEN: That's fine. I know she's 22 talked to the person that put it together. 23 MS. BLOTT: So I will agree that you can 24 use this at the deposition. 25 MR. OGDEN: Okay.</p>	<p style="text-align: right;">196</p> <p>1 MR. OGDEN: I'm also going to hand the 2 witness Exhibit 16, which is marked confidential, 3 attorney's eyes only. It's not Bates labeled and was 4 provided to counsel by Ms. Blott and a Mr. Dustin 5 Whittenburg. 6 Is that his name, Dustin or Justin? 7 MS. BLOTT: Dustin Whittenburg. 8 MR. OGDEN: Was provided to counsel by 9 Dustin Whittenburg at plaintiff's counsel's office two 10 weeks ago in a meeting where myself, Mr. Bankston 11 Mr. Whittenburg, and Ms. Blott met. 12 Also gonna hand over Exhibit 17, which is 13 also marked attorney's eyes only, but it's actually a 14 public record. It's just the UCC filing that we 15 discussed. That'll be Exhibit 17. 16 (Exhibit 17 marked.) 17 Q. (By Mr. Ogden) Just hold those. We're gonna 18 work on that one first. 19 Now -- now that you have Exhibit 15 -- I 20 believe is the one you pulled out of your purse, 21 correct? 22 A. No. 14. 23 Q. 14. Okay. 14. 24 All right. Same question: What is the 25 net worth of Free Speech Systems?</p>
<p style="text-align: right;">195</p> <p>1 MS. BLOTT: Provided that we agree that 2 this document will not be produced or cir- -- will not 3 be circulated, will remain confidential, unless and 4 until one of us applies to the Court to release it to 5 dissemination. 6 MR. OGDEN: We don't have a protective 7 order in place. So if we use it -- what am I -- then 8 what happens to all the testimony that we have about it? 9 MS. BLOTT: Well, right. Oh. 10 THE WITNESS: I don't even know what that 11 is. 12 MR. OGDEN: I know. It's kind of putting 13 me in a little pinch here. 14 MS. BLOTT: I know. And I'm sorry. Both 15 of us. 16 So, yes, go ahead. 17 MR. OGDEN: So we can use this in the 18 deposition. 19 MS. BLOTT: (Nodding.) 20 MR. OGDEN: Okay. 21 (Exhibit 15 marked.) 22 MR. OGDEN: I'm gonna hand the witness 23 Exhibit 15, which is Bates labeled FSS, underscore, NET, 24 underscore, 204. 25 (Exhibit 16 marked.)</p>	<p style="text-align: right;">197</p> <p>1 A. This is the profit-loss statement. So this 2 document does not reflect a profit-loss number. The 3 prof- -- the net worth of Free Speech Systems is 4 negative \$53 million and change. 5 Q. Okay. How do you know? 6 A. This is based on my conversations and my review 7 of the documents. So I did -- as I previously 8 represented, I spoke to Mr. Roe. I also -- like I said 9 earlier, I have seen this answer regarding the net 10 worth, and I do know that these numbers are updated 11 because these were revised for 2020. So the numbers 12 that we see in Exhibit 13 are off by about \$160,000, but 13 are otherwise accurate. 14 Q. It does not sound like Free Speech Systems 15 operates a very good business, does it? 16 A. I think I testified to that earlier that I did 17 not think that it was -- that Mr. Jones was a good 18 businessman. 19 Q. Considering that he ran a company that was 20 highly profitable into a negative \$53 million debt. 21 That's your understanding? 22 A. That is my understanding, yes. 23 Q. Okay. Who is that debt owed to? 24 A. A vast majority of that debt is approximately 25 \$53 million -- \$54 million so debt to PQPR on the basis</p>

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<p style="text-align: right;">198</p> <p>1 of costs of products that were not paid to PQPR. 2 Q. Okay. How many -- how long has that debt been 3 accruing? 4 A. I think that that debt was accruing up to a few 5 months ago, and I don't know when it started, 6 unfortunately. I could tell you the reasons why it was 7 accruing, but I don't -- I don't know when it was 8 started to be accruing. 9 Q. All right. Let me see those real quick. 10 A. This one? 11 Q. Yeah. This stack of (inaudible) here -- yeah. 12 Okay. 13 Who -- what -- how did we get to a 14 \$53 million note? 15 A. Sure. So PQPR is the company that purchases 16 the products that are ultimately sold on the Infowars 17 website. And for a number of years -- and I'm sorry I 18 don't know for how long -- all of the money was flowing 19 to Free Speech Systems instead of being paid to PQPR. 20 They were kind of just giving the money here and there, 21 but with no regularity. And so the amount of money that 22 was owed to PQPR for those products totals that amount 23 of money. 24 Q. Okay. Who at PQPR was able to front 25 \$53 million?</p>	<p style="text-align: right;">200</p> <p>1 A. Right. So five days -- so, yes. So per five 2 business days, \$11,000. 3 Q. The -- 4 A. Plus the percentage. 5 Q. The -- when you say it started a few months 6 ago, when? 7 A. I believe that -- based on my conversations 8 with Mr. Roe, the financial disentanglement between the 9 two companies happened within the last few months, 10 perhaps back to September. But it's relatively recent. 11 Q. Do you know what triggered that? 12 A. I know that Mr. Jones had begun some -- some 13 estate management that was in -- in motion in the years 14 prior. And I also know that PQPR and an attorney 15 associated with PQPR retained Mr. Roe as a consultant to 16 try to disentangle this. I can't say as to when he 17 was -- he was retained to do that. He wasn't retained 18 by Free Speech. He was retained by -- by I believe an 19 attorney -- I can't remember his name -- on behalf of 20 PQPR. 21 Q. His name's Eric Todd. 22 A. I don't think that's the person that retained 23 him, no. 24 Q. The only reason I say this is because 25 Mr. Whittenburg is the attorney you're talking about</p>
<p style="text-align: right;">199</p> <p>1 A. I don't know -- I can't answer anything for 2 PQPR. I don't represent them as a corporate 3 representative. 4 Q. Sure. 5 A. I don't know. 6 Q. In -- where did you learn about PQPR? 7 A. When I was discussing the structure of the 8 company from Melinda and how the -- the money is paid 9 from Free Speech to PQPR and who has ownership interests 10 in PQPR and Free Speech. That's how I found it out. 11 Q. How -- 12 A. Based on my conversations. 13 Q. How is the money paid? 14 A. Now how is it paid to PQPR? I can say now how 15 it is. Previously, I don't know. 16 So within the last few months, there is 17 this debt, and Free Speech has been attempting to pay 18 this debt down. It pays PQPR \$11,000 per week -- I 19 believe it's per business day -- five business days. So 20 it's not seven business days, five -- five business 21 days -- plus a percentage of the products that are sold 22 on the site in attempt to address the backlog. 23 But prior to the last few months when it 24 was -- it wasn't being paid with any regularity. 25 Q. So 11,000 -- so \$44,000 every 20 days?</p>	<p style="text-align: right;">201</p> <p>1 that was retained, correct? 2 A. No. That's not accurate. 3 Q. Well, then who is the attorney that was 4 retained? 5 A. Like I said, I don't remember his name. 6 Q. So you don't remember the name of anybody 7 that -- of the person that represents PQPR. You don't 8 remember the attorney that was retained by that person 9 at PQPR. 10 A. I don't -- I'm not the corporate representative 11 for PQPR. 12 Q. I know. 13 A. So I don't know. 14 Q. Just trying to figure out what you know. 15 A. Yeah. 16 Q. So a lawyer at PQPR hired a lawyer? 17 A. No. The lawyer hired Mr. Roe. 18 Q. Gotcha. 19 A. Right. As a consultant. 20 Q. Okay. If you look at -- let's look at 21 Exhibit 15. 22 A. Okay. 23 Q. Do you see the redactions? 24 A. Yes. 25 Q. Why are those redacted?</p>

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<p style="text-align: right;">202</p> <p>1 A. I don't know.</p> <p>2 Q. Have you seen copies without redactions?</p> <p>3 A. I've only seen the Exhibit -- Exhibit 14.</p> <p>4 Q. So you -- someone showed you the profit-loss</p> <p>5 breakdown, but nobody preparing you to talk about net</p> <p>6 worth showed you the actual balance sheet?</p> <p>7 A. Wait, I'm sorry. Just give me one second.</p> <p>8 I don't know what the redactions are. I</p> <p>9 may have seen this. It may have been in the binder that</p> <p>10 I brought yesterday, but I don't know what the</p> <p>11 redactions are.</p> <p>12 Q. Okay. You said that you had an electronic copy</p> <p>13 of the binder.</p> <p>14 A. No. I have an electronic copy of my notes</p> <p>15 on -- in the -- from the binder. So I -- I don't have</p> <p>16 an electronic copy of this.</p> <p>17 Q. It's my understanding that Ms. Blott printed</p> <p>18 out all the documents in your binder yesterday, correct?</p> <p>19 A. I believe she put the binder together for me,</p> <p>20 yes, because I didn't have a printer.</p> <p>21 Q. Okay. Did you send her everything that needed</p> <p>22 to go in the binder and then she printed it for you?</p> <p>23 A. No. I sent her my notes to go into the binder.</p> <p>24 Q. Everything else that was in there was put in</p> <p>25 there by Ms. Blott?</p>	<p style="text-align: right;">204</p> <p>1 PQPR has a \$54.876 million note that</p> <p>2 Infowars -- or that Free Speech Systems is responsible</p> <p>3 for paying?</p> <p>4 A. Yes. Just with the caveat that that number I</p> <p>5 don't think is accurate anymore, just because, like I</p> <p>6 said, we've been paying down the debt. It's a little</p> <p>7 over -- it's probably a little over \$53 million. But,</p> <p>8 principally, yes, that's correct.</p> <p>9 Q. Where were you getting the exact number from?</p> <p>10 A. So the numbers that are in the -- the answer</p> <p>11 regarding net worth in Exhibit 13.</p> <p>12 Q. Uh-huh.</p> <p>13 A. These numbers are accurate with the caveat that</p> <p>14 it's off by about \$160,000, which is what the updated</p> <p>15 information was that was provided to us this week. The</p> <p>16 reason why there is a discrepancy of the \$160,000 was</p> <p>17 there's some -- some writeoffs regarding the equipment</p> <p>18 that needed to be corrected.</p> <p>19 Q. Who did that correction?</p> <p>20 A. I -- I don't know. It -- it might have been --</p> <p>21 it probably would have been the tax attorney, but I'm</p> <p>22 not sure, so I don't -- I don't want to say.</p> <p>23 Q. Okay. So these numbers are from 2020, correct?</p> <p>24 A. The ones that you're referring to?</p> <p>25 Q. Exhibit 15 and Exhibit 14 are numbers from</p>
<p style="text-align: right;">203</p> <p>1 A. I believe so.</p> <p>2 Q. How did Ms. Blott get a copy of the profit-loss</p> <p>3 breakdown that is Exhibit 14?</p> <p>4 A. I don't -- I don't know where this came from.</p> <p>5 Q. That's 15.</p> <p>6 A. 15, right.</p> <p>7 So 14 -- you're asking for 14?</p> <p>8 Oh, I believe I testified to this. We</p> <p>9 received this from Melinda. Melinda printed this off of</p> <p>10 QuickBooks.</p> <p>11 Q. Okay. And that was on Friday?</p> <p>12 A. Yes.</p> <p>13 Q. And that was put into your binder?</p> <p>14 A. Yes. This is in my binder. I remember this</p> <p>15 being in my binder.</p> <p>16 Q. And then the balance sheet, Exhibit 15, it's</p> <p>17 your testimony that that is also in your binder?</p> <p>18 A. I think it is in the binder.</p> <p>19 Q. Okay.</p> <p>20 A. Because I remember that Attorney Blott told me</p> <p>21 it was in the binder, but I didn't physically print it,</p> <p>22 though. So...</p> <p>23 Q. So Free Speech Systems has a 53 -- \$54,876,000</p> <p>24 note that it owed -- or, excuse me -- has a note that it</p> <p>25 is secured against -- sorry. Let me back up.</p>	<p style="text-align: right;">205</p> <p>1 2020, correct?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And Exhibit -- what is it -- 13, the</p> <p>4 interrogatory?</p> <p>5 A. Yes.</p> <p>6 Q. Exhibit 13, that was produced in December of</p> <p>7 2021?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And it's now your -- it's your testimony</p> <p>10 that the number that was given -- I don't know -- 60</p> <p>11 days ago, 70 -- 75 days ago is not accurate, and,</p> <p>12 instead, we go look at the balance sheet and profit-loss</p> <p>13 sheet that have adjustments made by someone of \$160,000,</p> <p>14 and that's the accurate number for the net worth of the</p> <p>15 company at the end of 2020?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Why was -- why were adjustments being</p> <p>18 made in the last 75 days to a balance sheet from almost</p> <p>19 two years ago?</p> <p>20 A. I don't know. I'm not an accountant. I don't</p> <p>21 know why -- I don't know.</p> <p>22 Q. Okay.</p> <p>23 A. I think there was an error that was found</p> <p>24 regarding the -- the -- I'm sorry -- I'm not a -- I'm</p> <p>25 not really a tax attorney.</p>

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<p>206</p> <p>1 Q. Why do you think that?</p> <p>2 A. Just based on my conversations with Mr. Roe</p> <p>3 regarding why -- the accuracy of these numbers --</p> <p>4 Q. And, again, you --</p> <p>5 A. -- and the reason why this was updated.</p> <p>6 Q. Again, we established that you are unaware of</p> <p>7 any findings in Connecticut on Mr. Roe's accounting</p> <p>8 practices, correct?</p> <p>9 A. I'm aware that there was an issue in</p> <p>10 Connecticut, but I wouldn't say I'm aware of issues</p> <p>11 regarding his practices.</p> <p>12 Q. Okay. Do -- do you know whether or not he was</p> <p>13 found to have manipulated the numbers?</p> <p>14 A. I didn't read that decision, so I don't -- I'm</p> <p>15 not aware of the finding.</p> <p>16 Q. What's your -- what's your understanding of</p> <p>17 what happened?</p> <p>18 A. My understanding of what happened was there was</p> <p>19 a document that was produced, and there were lines at</p> <p>20 the bottom that were missing or cut off and that</p> <p>21 subsequently the accurate numbers with the lines that</p> <p>22 were missing were produced.</p> <p>23 Q. Well, that doesn't sound like anything</p> <p>24 nefarious, true?</p> <p>25 A. Not to me.</p>	<p>208</p> <p>1 Q. What's Schedule C?</p> <p>2 A. The taxes. I think I said I reviewed the taxes</p> <p>3 earlier.</p> <p>4 MR. OGDEN: Do we have any taxes?</p> <p>5 MR. BANKSTON: No.</p> <p>6 A. So Free Speech is reported in Mr. Jones' taxes.</p> <p>7 So I would -- I -- he showed me the Schedule C. So when</p> <p>8 I testified earlier, I reviewed the taxes, that's what I</p> <p>9 reviewed, because those are where Free Speech's income</p> <p>10 is reported.</p> <p>11 Q. (By Mr. Ogden) Okay. Where -- where is the</p> <p>12 copy of those?</p> <p>13 A. I'm sorry. I don't have a copy of those.</p> <p>14 Q. You didn't ask for a copy of the document</p> <p>15 that's filed with the federal agency that reflects Free</p> <p>16 Speech Systems' income?</p> <p>17 A. I don't have a copy of the -- of the Schedule</p> <p>18 C, no.</p> <p>19 Q. Okay. What's in it?</p> <p>20 A. I can't testify as to the numbers that are --</p> <p>21 that are in there.</p> <p>22 Q. Why?</p> <p>23 A. Because I don't recall. I can't give you an</p> <p>24 exact number, and I don't want to tell you a wrong</p> <p>25 number.</p>
<p>207</p> <p>1 Q. Did you know that the -- do you know what the</p> <p>2 basis for the Connecticut Court's granting of the</p> <p>3 default judgment? Do you know why they did that?</p> <p>4 A. No, I don't.</p> <p>5 Q. Would it surprise you to know that Mr. Roe's</p> <p>6 accounting practices had a little bit to do with that?</p> <p>7 A. Like I said, I didn't review it, so I don't</p> <p>8 know.</p> <p>9 Q. Okay. Do you find Mr. Roe to be reliable?</p> <p>10 A. I found him to be forthcoming in answering all</p> <p>11 of my questions and providing me the information that I</p> <p>12 requested and explaining this to me so that I could</p> <p>13 testify cogently about it.</p> <p>14 Q. What were your questions to him?</p> <p>15 A. I asked him to explain to me these numbers. I</p> <p>16 asked him to explain to me why it -- why the numbers</p> <p>17 were -- were slightly different. I asked him to explain</p> <p>18 to me how Free Speech has been addressing the debt. I</p> <p>19 asked him to explain to me the --</p> <p>20 Q. Does it --</p> <p>21 A. He -- he -- and the -- also, the -- the --</p> <p>22 the -- what's it called? The tax -- the Schedule C. I</p> <p>23 asked him to explain that to me, too. And I -- I think</p> <p>24 that that's it. I think that I spoke to him for an hour</p> <p>25 or two. It wasn't a very long conversation.</p>	<p>209</p> <p>1 Q. Why didn't you ask for a copy of that?</p> <p>2 A. I saw it. I don't -- I, honestly, assumed that</p> <p>3 you had it.</p> <p>4 Q. Okay. But if you knew you had to testify about</p> <p>5 this and there was a filed document that reflected</p> <p>6 income for Free Speech Systems, why didn't you get a</p> <p>7 copy and bring it with you?</p> <p>8 A. Like I said, I assumed you had it.</p> <p>9 Q. Do you have an electronic copy?</p> <p>10 A. I don't -- no, I don't have an electronic copy.</p> <p>11 Q. Okay. So Mr. Roe gave you a hard copy and</p> <p>12 then --</p> <p>13 A. No. He didn't give me a hard copy. He showed</p> <p>14 me a copy. He did not give me a copy. I don't have a</p> <p>15 copy of the Schedule C.</p> <p>16 Q. And you just purposefully didn't ask him for a</p> <p>17 copy to put with the -- I mean, you went to accounting</p> <p>18 and asked her to pull a profit-loss breakdown?</p> <p>19 A. Well, I did that because this is -- I know this</p> <p>20 is different. This is updated information that was</p> <p>21 updated just this past week. So that's why I did that.</p> <p>22 Q. Why were the profit-losses from 2020 updated in</p> <p>23 February of 2022?</p> <p>24 A. As I testified earlier, there was an issue with</p> <p>25 the -- the deductions associated with some of the</p>

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<p style="text-align: right;">210</p> <p>1 equipment and that had to be adjusted.</p> <p>2 Q. And you learned that -- and Mr. Roe was the one</p> <p>3 that made that adjustment and informed you, correct?</p> <p>4 A. I don't know whether he made the adjustment,</p> <p>5 but he informed me of why the numbers were different.</p> <p>6 Q. Did you ask why so late?</p> <p>7 A. I didn't ask why so late.</p> <p>8 Q. Do you think, sitting here today under oath,</p> <p>9 that -- that the numbers that are putting forth in these</p> <p>10 balance sheet, the profit-loss, and everything -- and</p> <p>11 the documents, Exhibit 17, do you believe those are</p> <p>12 accurate?</p> <p>13 A. Yes. With the -- with the exception that -- of</p> <p>14 the \$160,000 that I testified to, these numbers are</p> <p>15 accurate.</p> <p>16 Q. Is it normal, based on any experience you may</p> <p>17 have, for a company to accrue a \$53 million debt over an</p> <p>18 unknown amount of years, paying zero back on it, and</p> <p>19 then in the middle of litigation, post losing a default</p> <p>20 judgment dispute, all of the sudden that debt's secured</p> <p>21 up and a payment system's been made in the last four --</p> <p>22 four months? Does that sound normal?</p> <p>23 A. I -- well, first of all, I don't have any</p> <p>24 experience with that, so I don't think I am qualified to</p> <p>25 answer that question. But I also don't know when that</p>	<p style="text-align: right;">212</p> <p>1 Q. And a consultant for what? These cases?</p> <p>2 A. So I -- just -- just to make clear, he</p> <p>3 originally was retained by PQPR.</p> <p>4 Q. How do you know?</p> <p>5 A. Just based on my conversations with him, he</p> <p>6 worked for PQPR. And then at some point in time, that</p> <p>7 ended, and then he was subsequently retained as</p> <p>8 consultant for Free Speech. But, originally, he was</p> <p>9 retained by PQPR. That's the discussion we had earlier</p> <p>10 about the lawyer for PQPR who had retained Mr. Roe.</p> <p>11 Q. Okay. So you got a company that has a dormant</p> <p>12 debt of about 50 -- over \$50 million. You've got some</p> <p>13 sort of -- I don't even know if you can -- financial</p> <p>14 consultant, tax consultant.</p> <p>15 What is -- what kind of consultant?</p> <p>16 A. I don't know how to -- how to describe it.</p> <p>17 Q. So you --</p> <p>18 A. Just consultant.</p> <p>19 Q. So somebody could just walk into you as a</p> <p>20 corporate representative preparing for a deposition, and</p> <p>21 say, hey, I'm a consultant, and you're just believing</p> <p>22 every word they say?</p> <p>23 A. No. He was already retained by the company</p> <p>24 prior to me coming there. Mr. Jones indicated to me</p> <p>25 this was the person that was gonna help me understand</p>
<p style="text-align: right;">211</p> <p>1 note was written, so I -- I don't -- I'm not qualified</p> <p>2 to answer that question.</p> <p>3 Q. Does Mr. Roe work at Infowars?</p> <p>4 A. No. He's not an employee of Infowars.</p> <p>5 Q. Okay. Where's he an employee of?</p> <p>6 A. He's a consultant. He's an independent</p> <p>7 consultant.</p> <p>8 Q. He's a consultant, or he's a tax attorney, or</p> <p>9 he's a CPA? What is it?</p> <p>10 A. I don't know. You'd have to ask him. He's not</p> <p>11 an employee.</p> <p>12 Q. Well, you were tasked with learning the net</p> <p>13 worth of the company.</p> <p>14 A. Yes.</p> <p>15 Q. And some random person came in and started</p> <p>16 telling you stuff.</p> <p>17 And you didn't vet what his credentials</p> <p>18 were?</p> <p>19 A. No. I'm not -- I wasn't responsible for</p> <p>20 retaining him. So he was retained by the company. I</p> <p>21 didn't vet him myself, if that's the question. But --</p> <p>22 Q. So Free Speech --</p> <p>23 A. -- he had already been hired.</p> <p>24 Q. So Free Speech Systems retained Mr. Roe?</p> <p>25 A. Yes. As a consultant.</p>	<p style="text-align: right;">213</p> <p>1 the financial documents. And so did I trust Mr. Jones'</p> <p>2 representation as to Mr. -- Mr. Roe, then, yes, that's</p> <p>3 accurate. But, no, a random person didn't just walk in.</p> <p>4 Q. So Mr. Jones vouched for Mr. Roe? That's your</p> <p>5 testimony?</p> <p>6 A. He indicated to me this was the person that</p> <p>7 would help me understand the documents.</p> <p>8 Q. Okay. Do you understand these documents?</p> <p>9 A. I am not an accountant, and I am not good with</p> <p>10 numbers. So I'm doing my best here.</p> <p>11 Q. If Mr. Roe is a consultant, wouldn't he be the</p> <p>12 person that should have been designated for this topic?</p> <p>13 A. I don't -- I think that I can answer your</p> <p>14 questions adequately.</p> <p>15 Q. Well, you just said you're not an accountant;</p> <p>16 you're not a financial person.</p> <p>17 A. I'm not.</p> <p>18 Q. Okay. And you don't know what my questions are</p> <p>19 gonna be.</p> <p>20 A. No, I don't.</p> <p>21 Q. Yet, your testimony to the jury, under oath, is</p> <p>22 that you can answer them.</p> <p>23 A. I think I understand enough about it to be able</p> <p>24 to answer the questions.</p> <p>25 Q. Instead of wasting time talking with Mr. Roe</p>

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<p style="text-align: right;">214</p> <p>1 about this topic, don't you think it would have been 2 more efficient to let you have less topics and less 3 preparation and focus on the other stuff and then let 4 Mr. Roe discuss all the things that he's been doing? 5 A. Unfortunately, that is above my pay grade. I 6 don't make such decisions. 7 Q. Did -- would Mr. Roe be more qualified to talk 8 on this subject than you? 9 A. I don't know because I don't know the questions 10 you're going to ask me. 11 Q. Well, let's say this: In preparation -- in 12 preparing for today, Mr. Roe gave you the information 13 you needed, correct? 14 A. Not all of it. So the profit-loss statement, 15 as I said earlier, I received this from Melinda, and 16 this was in -- amongst the materials that I had access 17 to; although, Mr. Roe went through it with me. 18 Q. Who owns PQPR? 19 A. PQPR is owned 20 percent by Dr. and Mrs. Jones 20 and 80 percent by PLJR, ALC [sic]. 21 Q. David Jones, what was his wife's name? 22 20 percent by David Jones and who? 23 A. And his wife. I'm sorry. Her name is escaping 24 me right now. And Mrs. Jones. 25 Q. Carol, I think, right?</p>	<p style="text-align: right;">216</p> <p>1 A. Yeah. LLC. So -- so, like I said, I think 2 that the -- the trust was executed in that year, but the 3 estate planning for the trust had begun prior to that. 4 Q. That's fine. 5 A. Sure. 6 Q. My question was just PLJR. 7 And the -- who is the trustee for this 8 trust? 9 A. The trustee? You know, I'm not sure who the 10 trustee is. I know who the beneficiaries are. 11 Q. Who are the beneficiaries? 12 A. So the beneficiaries are -- of the corpus of 13 the trust are his children, so they're -- in the trust 14 are, you know, whatever money is in there. And Alex as 15 a remainderman. And then the income going into the 16 trust is paid to Alex. 17 Q. Okay. So Mr. Jones' income comes from the 18 profits of the trust. 19 A. But, ultimately, that -- I don't think that 20 income -- 21 Q. I didn't ask a question -- 22 A. Okay. 23 Q. -- Ms. Paz. 24 MS. BLOTT: Can I ask when we're referring 25 to Mr. Jones, we articulate which Mr. Jones we are</p>
<p style="text-align: right;">215</p> <p>1 A. Oh, yes. That's sound right. 2 Q. Carol Jones. 3 Okay. And then were PLJR. 4 A. PLJR owns 80 percent of PQPR. 5 Q. Okay. And who owns PLJR? 6 A. PLJR is owned 10 percent by Carol Jones, so 7 Mrs. Jones, Alex's mother, and 90 percent by the AEJ 8 Trust 2018. 9 Q. Okay. When did the trust begin? 10 A. So I think the trust was finalized in 2018, 11 that's why it says AEJ Trust. But as I said earlier, 12 Mr. Jones had actively been engaged in estate planning 13 prior to that. But I think it was officially formed -- 14 formed in that year. 15 Q. Okay. 16 MR. BANKSTON: Who's JLJR? Who's this 17 one? 18 Q. (By Mr. Ogden) Yeah. I've got a JLJR, as well. 19 A. You know what, I'm not sure about that one. I 20 know PLJR is -- is the one that's -- owns PQPR. 21 Q. Okay. The -- so Free Speech Systems gets into 22 litigation early 2018, and the trust is executed that 23 same year through PLJR, ALC [sic], correct? 24 A. ALC or LLC? 25 Q. LLC.</p>	<p style="text-align: right;">217</p> <p>1 referring to? 2 THE WITNESS: Oh, you mean whether it's 3 Dr. Jones or Alex Jones? Okay. 4 MS. BLOTT: So that there's no confusion 5 in the record. 6 Q. (By Mr. Ogden) The income -- so the income goes 7 to the remainderman, Mr. -- Mr. Alex Jones, correct? 8 A. The income -- the income is paid to Mr. Jones, 9 but with the caveat, which is what I was trying to say 10 before, that there is another entity, AEJ Holdings, that 11 owns Alex's interest in -- in PL -- in PQPR. So, total, 12 Alex's interest is like 72 percent. 13 Q. Say that again AL... 14 A. AEJ Holdings, LLC. 15 Q. What's -- do you know Alex Jones' middle name? 16 A. I don't. I'm so sorry. 17 Q. I bet it starts with an E, though, huh? 18 A. (Nodding.) 19 So that ownership interest in PQPR, he 20 owns about a -- if you divide it amongst his parents and 21 their percentages, he owns a 72 percent interest. So he 22 sold his interest in that to AEJ Holdings, and there's a 23 25.9 or 29 -- \$25.9 million note on that. 24 Q. Okay. Where's that come from? 25 A. What do you mean where does it come from?</p>

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<p style="text-align: right;">218</p> <p>1 Q. Where does the \$29 million note come from -- 2 or, I guess, 29.9. 3 Where does the \$30 million note come from? 4 A. So I thought I had seen the note. It's the -- 5 it represents the value of Mr. Jones' interest in PQPR. 6 Q. Okay. 7 A. Such that it -- such as it were because it's 8 about -- it's 72 percent. And then the money that is 9 paid principal and interest off of that note is paid to 10 Alex Jones. 11 Q. And I don't need you to, you know, kind of be 12 shooting from the hip guessing on the numbers. If you 13 need to refer back to your notes, that's fine. 14 A. No. I believe that that's accurate. It's 15 25.9. 16 Q. Okay. Did you take notes when you met with 17 Mr. Roe? 18 A. (Shaking head.) I don't believe so. Aside 19 from looking at the documents. 20 Q. Okay. So Mr. Roe just broke down 20 percent to 21 David Jones; 80 percent to PLJR, LLC, who PLJR is 22 10 percent Carol, 90 percent AEJ Trust, which has 23 Mr. Jones' children as beneficiaries, Mr. Jones as the 24 remainderman, and the income due to the remainderman 25 goes to AEJ Holdings, which is 72 percent of the</p>	<p style="text-align: right;">220</p> <p>1 after she gets some copies to scan in. 2 A. I haven't reviewed -- 3 Q. I'm sorry. 4 MR. OGDEN: Ms. Paz. 5 A. -- the notebook. I'm just saying, I haven't 6 reviewed it. 7 Q. (By Mr. Ogden) Can I see that? 8 A. Sure. 9 Q. Thank you. 10 (Witness handing notepad over.) 11 (Brief pause as Mr. Ogden reviews 12 notepad.) 13 MS. BLOTT: These are the notes that were 14 transcribed and provided to you. 15 MR. OGDEN: They were? 16 Because I don't remember these notes on 17 here. These notes with the conversation with Bob, those 18 aren't in there. I got \$70 million sales. Looks 19 like -- what is that under there? 20 Q. (By Mr. Ogden) 260 D. 21 What is that? 22 A. Divided by 260 days. 23 Q. Okay. 24 A. Those are business days. 25 Q. And then, also, in Exhibit 18, you've got this</p>
<p style="text-align: right;">219</p> <p>1 interest, which would be roughly \$29.9 million; that's 2 correct? 3 A. 72 percent of his interest in -- which 4 represents his interest in PQPR, not of the interest, 5 but his interest in that company. 6 Q. Okay. And you just can do all -- you -- you 7 learned all of that from Mr. Roe with no financial 8 background without taking any notes? 9 That's just what I want to make clear for 10 the record. 11 A. I have a decent memory. 12 Q. Okay. I noticed you pulled your yellow pad 13 out. 14 A. I have some notes. 15 Q. Let's mark that as Exhibit 18. 16 A. I don't think I took any notes. 17 (Exhibit 18 marked.) 18 Q. (By Mr. Ogden) Mark the whole thing. 19 A. The whole -- I don't know if there's any 20 information in there about my other clients. 21 Q. Okay. Well, it's been pulled out, and you said 22 that you got notes in it. 23 So by the Rules of Texas Procedure, I can 24 mark it as an exhibit, and it's gonna be admitted into 25 the deposition's record. And you'll get a copy back</p>	<p style="text-align: right;">221</p> <p>1 no way to determine -- 2 A. Which. 3 Q. -- which... 4 A. I don't -- I'm sorry. I can't read my own 5 handwriting. 6 Q. Blank generated checks. 7 A. I don't -- wait. Generated. Generated. That 8 is generated, yes. 9 Q. What is that one? 10 A. I'm not sure. 11 Q. Okay. So -- 12 A. But I -- I think -- 13 Q. And then it says here, no spoliation letter. 14 Then it talks about deplatforming. 15 What do you mean no spoliation letter? 16 A. I asked when -- or if he knew or if anybody at 17 the company knew whether we had received a spoliation 18 letter for the Sandy Hook litigation. 19 Q. Okay. It says chain of title in parentheses. 20 Tell me about the chain of title you and 21 Bob talked about. 22 A. That's what I just went over -- 23 Q. Okay. 24 A. -- regarding Free Speech and the ownership 25 per -- on the ownership and who owns what and what</p>

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<p style="text-align: right;">222</p> <p>1 percentages. But, ultimately, I did talk to Melinda 2 about that, too. 3 Q. These two words right here (indicating), what 4 does that say? 5 A. Bill Love files tax returns. 6 Q. Okay. Who is Bill Love? 7 A. I believe he's the company's tax attorney. 8 MS. BLOTT: And just let me interrupt a 9 minute. 10 Are there any notes in there about 11 conversations you and I had? 12 THE WITNESS: There might be. That's why 13 I'm saying I haven't reviewed it. That's why I'm saying 14 I think that I should review it first. 15 MR. OGDEN: Ms. Blott, the witness pulled 16 this out to rely on it in answering my questions. 17 A. I did not look at that to answer your 18 questions, sir. 19 Q. (By Mr. Ogden) Okay. Well, we can go back to 20 video, if you'd like, and I can -- there's -- I watched 21 you start doing this (flipping pages in notebook). 22 So... 23 A. I didn't look at anything in there. I didn't 24 pull out anything in there. 25 MR. OGDEN: Ms. Blott and I can handle</p>	<p style="text-align: right;">224</p> <p>1 me. 2 MS. BLOTT: Well, I don't give a shit. 3 Anyway, she transcribed the notes. They 4 were in her binder. 5 MR. OGDEN: Ms. Blott -- let's slow down. 6 Let's slow down, Ms. Blott. Let's slow down. 7 MS. BLOTT: You took her binder -- 8 MR. OGDEN: Ms. Blott. 9 MS. BLOTT: -- and she pulled out the 10 notebook because she does not have her transcribed 11 notes. 12 MR. OGDEN: Okay. Ms. Blott, let me just 13 back up. 14 One, I am one who admires, you know, 15 zealous advocacy of a client. Let's watch our language 16 on the record, just out of respect for the Court. 17 Second -- 18 MR. BANKSTON: If not for me. 19 MR. OGDEN: Second of all, if these were 20 transcribed, there should be no problem with me reading 21 them. 22 THE WITNESS: No. But... 23 MR. OGDEN: And your witness is the one 24 who made the decision to bring them and then take them 25 out.</p>
<p style="text-align: right;">223</p> <p>1 this. 2 Ms. Blott, how would you like to proceed? 3 MS. BLOTT: I would like to look at it 4 such that to the extent and only to the extent that she 5 took any notes regarding conversations she had with me, 6 they be redacted. The entirety of -- of anything else 7 that she has in there, fair game. 8 MR. BANKSTON: Well, we -- just to put 9 this on the record -- this is Mr. Bankston. We would 10 have to bring a motion on that. Because if the witness 11 was using this notepad to refresh her memories, then 12 regardless if it contained privileged information, we're 13 entitled to see it. 14 MS. BLOTT: Well -- 15 MR. BANKSTON: So we'd have to bring a 16 motion on that. And so that's what we'd want to know is 17 if you want to take this from us right now. 18 MS. BLOTT: Yes, I do. 19 MR. BANKSTON: Okay. Then we can bring a 20 motion. 21 MS. BLOTT: Because -- just to clarify, 22 she transcribed those notes, and they were provided to 23 you and are in -- 24 MR. BANKSTON: Kind of sounds like you're 25 testifying about what that is, and that sounds weird to</p>	<p style="text-align: right;">225</p> <p>1 MS. BLOTT: I disagree. I'm going to... 2 MR. OGDEN: Disagree with what? Her 3 bringing them or taking it out? 4 MS. BLOTT: I disagree with the position 5 that you're taking. When she transcribed those notes, 6 she would have omitted conversations with me. 7 MR. OGDEN: Okay. 8 MS. BLOTT: Because she does not have -- 9 MR. OGDEN: If you would like to -- 10 MS. BLOTT: -- her transcribed notes -- 11 MR. OGDEN: If you would like to go 12 through -- and I'm not gonna read them. I just want to 13 see how deep into it. Okay. So it's pretty deep. 14 If you would like to go into this and -- 15 and redact -- or, I guess, just what are you gonna do? 16 Pull them out? 17 MS. BLOTT: No. I'm -- to the extent that 18 they're in the middle of the page with something else, 19 I'm going to redact it. 20 MR. BANKSTON: I'd like to have photo 21 copies made of that before you do that. 22 MS. BLOTT: Of what? 23 MR. BANKSTON: You need to make sure that 24 there's secured photocopies of what is under those 25 redactions.</p>

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<p style="text-align: right;">226</p> <p>1 MR. OGDEN: Yes. Before you redact -- how 2 are you going to redact? 3 MR. BANKSTON: Because we're going to move 4 to compel. 5 MR. OGDEN: Yeah. 6 Hold on, Mark. Let me do this. 7 How are you gonna redact this? Like 8 how -- the actual process of covering the information, 9 how are you gonna do it? 10 MS. BLOTT: Okay. Here's what I suggest: 11 I will scan them in so that the original is preserved, 12 and then I will use a copy and save the document and 13 redact any information as it relates to conversations 14 with me. 15 MR. OGDEN: Okay. How are we going to do 16 that and allow me to ask questions about the notes here 17 right now? 18 MS. BLOTT: Well, he's the one that just 19 said he wants to preserve it in its original form. So 20 what do you propose? 21 MR. OGDEN: I agree. I agree. 22 MS. BLOTT: We can go off the record, run 23 them through a copy machine. I can take the originals. 24 MR. OGDEN: If we want to do that, I think 25 we can have Sonya do a copy.</p>	<p style="text-align: right;">228</p> <p>1 MR. OGDEN: We can go off the record. I 2 see -- I just realized you're pounding away. 3 THE VIDEOGRAPHER: We are off the record 4 at 2:19. 5 (Recess from 2:19 p.m. to 2:28 p.m.) 6 THE VIDEOGRAPHER: We are back on the 7 record at 2:28. 8 MR. OGDEN: We're back from a small break. 9 Ms. Blott, were you able to go through the 10 notes that Ms. Paz took out mid deposition? 11 And it's plaintiff's position that those 12 notes in their entirety should be able to be marked as 13 an exhibit and added as an exhibit to this deposition. 14 However, I believe Ms. Blott has taken issue with that 15 position. I'm not sure what the basis is, but I will -- 16 I will say -- one more point before I hand it over to 17 Ms. Blott. That a witness pulling out notes 18 privileged -- conversation with an attorney or not, are 19 not privileged and would be akin to an attorney sitting 20 there whispering into the witness' ear, which would also 21 be completely allowed to be produced and should be 22 produced to us. 23 MR. BANKSTON: Yeah. If I can just add 24 something to the record really quick. This is Attorney 25 Bankston.</p>
<p style="text-align: right;">227</p> <p>1 MR. BANKSTON: Let's do it right now. And 2 then let you sit down -- 3 MR. OGDEN: And I'll let you go through 4 it. I'm trying to hurry. It's 2:18 -- 5 MS. BLOTT: I understand. 6 MR. OGDEN: -- and I'm trying to get 7 Ms. Paz out of here by 4:00 o'clock. So... 8 THE WITNESS: Do you want -- do you want 9 me to go through it? 10 MR. BANKSTON: You know what might work 11 best is if you were to -- and I see you are reviewing 12 now. 13 MS. BLOTT: Yeah. 14 MR. BANKSTON: If you were -- if you were 15 to determine if you even need to redact. And if you do, 16 then I will make sure that this office scans it for you 17 and you're able to have a copy. 18 MS. BLOTT: This entire page needs to be 19 redacted. Well, yeah. 20 MR. BANKSTON: Okay. Well, why don't you 21 make arrangements with the office staff here to have 22 that scanned so you can have an electronic copy, and 23 then you can make whatever redactions you believe you 24 need to make and we can bring our motion. And then 25 Mr. Ogden can --</p>	<p style="text-align: right;">229</p> <p>1 And I'd just like to -- to make a citation 2 to the -- to the Kerns case. And -- I mean, that's just 3 something I pulled off the top here. But in Kerns, the 4 Court agreed that if materials that were otherwise 5 claimed as attorney-client privilege could be protected, 6 but when the witness relies on such documents to provide 7 deposition testimony, it presented, quote, a conflict 8 between the liberal interpretation required under our 9 own rules of discovery and the liberal construction in 10 favor of the exercise of the attorney-client privilege. 11 Therefore, the Court decided that any 12 privileges were waived once the witness relied on that 13 document to provide testimony. The Court said it would 14 be unconscionable to prevent the adverse party from 15 seeing and obtaining copies of it. 16 We've now been told that we will be 17 prevented from seeing and obtaining copies of them. We 18 object and we will move to compel. 19 MR. OGDEN: Thank you, Mark. 20 Ms. Blott, the floor's yours. 21 MS. BLOTT: Thank you, very much. 22 The legal pad that Ms. Paz pulled out is 23 the handwritten notes of the transcribed notes that she 24 provided to counsel yesterday. When she transcribed 25 those notes, she did not, obviously, include the</p>

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<p style="text-align: right;">230</p> <p>1 confidential communication with her -- with the counsel 2 for Free Speech Systems, Inc. And because she did not 3 have her transcribed notes with her today, she pulled 4 out the legal pad -- and did not have those notes, 5 through no fault of her own. 6 She pulled out the legal pad and has 7 not -- we will have to check the videotape. I don't 8 think that she has referred to it. However, that being 9 said, I have offered to take those portions of the 10 tablet that are subject to the attorney-client privilege 11 and redact them. And my understanding is that your 12 position is that that attorney-client privilege has been 13 waived. 14 MR. OGDEN: My -- my position is, yes, 15 it's been waived. 16 MS. BLOTT: Okay. 17 MR. OGDEN: For the sake of efficiency, 18 how many pages do you need to redact? 19 MS. BLOTT: Two. 20 MR. OGDEN: Okay. If you'd like to pull 21 that yellow piece of paper off and stick it over the 22 page that those are in, we can go through them with this 23 witness. We don't want to have to come back. It's 24 expensive for everybody. And then we can have that 25 given to the court reporter so that she can preserve the</p>	<p style="text-align: right;">232</p> <p>1 MR. OGDEN: The good part about it is, 2 when I go through that, other than those two pages 3 you're talking about, I bet they're verbatim. I hope 4 that they are. 5 THE WITNESS: Do you mean my notes? 6 MR. OGDEN: Uh-huh. 7 THE WITNESS: Pretty -- yeah. 8 The top part of the page. 9 MS. BLOTT: Okay. That's what I thought. 10 I just wanted to make sure. 11 THE WITNESS: This makes me wish my 12 handwriting was better. Now everybody's gonna see my 13 real -- 14 MS. BLOTT: Well, at least we're off the 15 record. 16 MR. OGDEN: Everybody's gonna think you're 17 a surgeon. 18 (Brief pause.) 19 (Ms. Blott handing notepad to Mr. Ogden.) 20 MR. OGDEN: Thank you. 21 Mark, take a gander. 22 Q. (By Mr. Ogden) Exhibit 16, maybe 17 -- 17. 23 A. Okay. 24 Q. Okay. Have you ever seen that before? 25 A. I don't remember.</p>
<p style="text-align: right;">231</p> <p>1 original, and we can brief whether or not we're entitled 2 to the two redacted pages. 3 And, just to be clear, the two pages 4 you're referring to are attorney work product or are 5 they attorney-client privilege? 6 MS. BLOTT: Attorney-client privilege. 7 MR. OGDEN: Okay. The bigger question is: 8 Are they, like, bad for you guys or what? 9 MS. BLOTT: No, not at all. 10 Oh, okay. 11 MR. OGDEN: I get caught up, too. 12 Sometimes I argue just to argue. I was just curious. 13 MS. BLOTT: Do you want me to pull these 14 out and photocopy them and give the originals to her? 15 Is that what you suggested? 16 MR. BANKSTON: Wouldn't we be fine -- 17 MR. OGDEN: I just said, we -- we can have 18 the court reporter withhold the exhibit -- the 19 unredacted version and she'll have a copy of it, and 20 then we can -- you can get that from her, send it to 21 Court, and we can have our motion. 22 MS. BLOTT: Well, just to be perfectly 23 clear, I don't have a problem with you having copies of 24 her notes, except to the extent of the pages that 25 contain...</p>	<p style="text-align: right;">233</p> <p>1 Q. Okay. Do you know what a UCC-1 is? 2 A. Kind of. Like I said, I'm not an accountant. 3 So kind of. 4 Q. Okay. You understand that this goes directly 5 to Free Speech Systems assets and/or liabilities, 6 correct? 7 A. Yes. 8 Q. What is -- what's your understanding of what a 9 UCC-1 does? 10 A. I don't -- I -- honestly, I don't think I could 11 tell you with any -- with any specificity. 12 Q. That's fine. You said that you had a general 13 understanding what it was. 14 I just want to know what you believe it 15 is. 16 A. I think it's a financing statement for the -- 17 for the company. 18 Q. What do you mean financing statement? 19 A. I think that it's a statement on the company's 20 finances to the government. 21 Q. Okay. What about the company's finances? 22 A. I -- I don't know. Like I said, I don't 23 recall. I don't know whether I've seen this. 24 Q. Okay. So that's fine. 25 A. I don't know if I've spoken to anybody about</p>

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<p style="text-align: right;">234</p> <p>1 it.</p> <p>2 Q. Based on those two answers, I'm gonna go ahead</p> <p>3 and assume really you don't know what this document is?</p> <p>4 A. Right.</p> <p>5 Q. Because you said it's a financing statement,</p> <p>6 which is -- it says UCC financing statement at the top.</p> <p>7 A. Basically.</p> <p>8 Q. You're just kind of reading it.</p> <p>9 So when it comes to liabilities of the</p> <p>10 company, are any of them secured?</p> <p>11 A. Secured by -- what do you mean? Secured by a</p> <p>12 note?</p> <p>13 Q. Do you know what a secured debt is?</p> <p>14 A. I'm sorry. I don't -- I don't know how to</p> <p>15 answer that, and I'm not sure what the answer is.</p> <p>16 Q. When coming to evaluate the company's net</p> <p>17 worth --</p> <p>18 A. Uh-huh.</p> <p>19 Q. -- you had to look at liabilities and you had</p> <p>20 to look at assets, right?</p> <p>21 A. Right. Yes.</p> <p>22 Q. Okay. Do you know what the difference is on a</p> <p>23 secured liability versus an unsecured liability?</p> <p>24 A. I don't know the difference.</p> <p>25 Q. So as you sit here today, you are in no</p>	<p style="text-align: right;">236</p> <p>1 Q. Because right here, we've got a UCC-1 statement</p> <p>2 that was filed on November 18th, 2020, correct?</p> <p>3 A. That's what it says.</p> <p>4 Q. By Bob Roe's company, correct?</p> <p>5 A. I see that.</p> <p>6 Q. On behalf of Free Speech Systems as the debtor,</p> <p>7 correct?</p> <p>8 A. That's correct.</p> <p>9 Q. And on -- and as the secured party in Paragraph</p> <p>10 3, it lists PQPR, correct?</p> <p>11 A. That's right.</p> <p>12 Q. Could that be a conflict of interest?</p> <p>13 A. I can't say.</p> <p>14 Q. Because it sounds like a conflict of interest.</p> <p>15 A. I don't -- I don't know.</p> <p>16 Q. Is it -- have you ever -- I think I know the</p> <p>17 answer to this.</p> <p>18 But have you ever seen a company secure a</p> <p>19 \$53 million debt nine months after a lawsuit is filed on</p> <p>20 a debt that no one has any idea how old it is or why</p> <p>21 it's so big?</p> <p>22 A. Well, I have an idea as to why it's so big.</p> <p>23 But I can't answer your primary question, which is, in</p> <p>24 my experience, have I ever seen that, because, as I've</p> <p>25 said, I don't have that kind of experience. I don't</p>
<p style="text-align: right;">235</p> <p>1 position to testify as to whether or not any of the</p> <p>2 company's net worth is in a secured debtor's hands or if</p> <p>3 any of it has been secured whatsoever, true?</p> <p>4 A. I don't know. That's right.</p> <p>5 Q. Okay. Do you -- you remember you talked to</p> <p>6 Bob?</p> <p>7 A. Yeah, I spoke to Bob.</p> <p>8 Q. And that's -- and that's Bob Roe?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And Mr. Roe, he gave you kind of a</p> <p>11 presentation, correct?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Do you know what company he works for?</p> <p>14 A. Acuity.</p> <p>15 Q. Okay. You see the name on the file at the</p> <p>16 top-left corner?</p> <p>17 A. Yes.</p> <p>18 Q. Do you know if Acuity -- do you know when Bob</p> <p>19 Roe became a consultant for Free Speech Systems -- Free</p> <p>20 Speech Systems and stopped his relationship with PQPR</p> <p>21 Holdings, Limited?</p> <p>22 A. I don't know the exact date of -- when I asked</p> <p>23 Bob about it, he said it was a couple of years ago.</p> <p>24 Q. Okay.</p> <p>25 A. So -- but I don't know the exact date.</p>	<p style="text-align: right;">237</p> <p>1 think I'm qualified to answer it.</p> <p>2 Q. Why is it so big?</p> <p>3 A. As I testified earlier, there had been a</p> <p>4 significant period of time where the -- the product that</p> <p>5 was being purchased and sold by PQPR on Infowars'</p> <p>6 website was not being paid to PQPR. And so that money</p> <p>7 represents the amount that is due and owing to PQPR for</p> <p>8 those sales.</p> <p>9 Q. Just for the benefit of the jury, you would</p> <p>10 agree that this spider web of trusts and secured</p> <p>11 beneficiaries for different subsidiaries or holding</p> <p>12 companies is just a way for Free Speech Systems to</p> <p>13 protect its money from people that file lawsuits against</p> <p>14 them?</p> <p>15 A. No, I don't agree.</p> <p>16 Q. Okay. Why'd they set it up this way?</p> <p>17 A. I don't know why it was set up this way.</p> <p>18 Q. But you definitely don't agree that it -- it</p> <p>19 was set up to -- to protect the assets of Mr. Jones?</p> <p>20 A. I don't know why it was set up. I don't think</p> <p>21 it was in relationship to this lawsuit.</p> <p>22 As I testified earlier, the trusts and</p> <p>23 that -- that structure of the companies was in motion</p> <p>24 prior to the lawsuit.</p> <p>25 Q. And you got that from Robert Roe?</p>

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<p style="text-align: right;">238</p> <p>1 A. Mr. Roe, Mr. Jones; that's correct.</p> <p>2 Q. Okay. So the individual who worked for one</p> <p>3 company, switched over and worked for another and</p> <p>4 secured debt to one another with the sole proprietor</p> <p>5 being a 72 percent beneficiary to three parent holding</p> <p>6 companies down.</p> <p>7 You trusted him and you trusted Mr. Jones,</p> <p>8 the sole proprietor of a company that is the subject of</p> <p>9 a number of defamation lawsuits involving parents who</p> <p>10 lost children in a school shooting, who he, for years,</p> <p>11 then went on to say that it didn't happen or it did, but</p> <p>12 -- but there was a government conspiracy and all this</p> <p>13 other stuff.</p> <p>14 That -- those are the two people you</p> <p>15 trusted, correct?</p> <p>16 A. Those are the people with the information, so</p> <p>17 yes.</p> <p>18 Q. You think it's odd that they picked somebody</p> <p>19 for this topic that has zero financial background?</p> <p>20 A. I can't answer that; I don't know.</p> <p>21 Q. When -- were you surprised when they said</p> <p>22 you're gonna be talking about our finances and net</p> <p>23 worth?</p> <p>24 A. I wasn't surprised. I had seen the notice of</p> <p>25 deposition.</p>	<p style="text-align: right;">240</p> <p>1 ask?</p> <p>2 A. Well, I didn't know to ask. But I think that</p> <p>3 they tried to give me the information that I needed to</p> <p>4 testify on the topic.</p> <p>5 Q. You said that you think they tried to give you</p> <p>6 the answer -- the information you needed.</p> <p>7 Or could it also be that they -- you</p> <p>8 accepted as true the answers that they wanted you to</p> <p>9 accept?</p> <p>10 A. No. I think also the problem is that I</p> <p>11 don't -- I am not -- I am a corporate rep for Free</p> <p>12 Speech; I'm not a corporate rep for PQPR or PLJR. So I</p> <p>13 don't think that I need to necessarily have all the</p> <p>14 nitty-gritty informations [sic] on other companies that</p> <p>15 are not Free Speech.</p> <p>16 Q. Okay. Based on this balance sheet, how is</p> <p>17 Mr. Jones covering his bills every month?</p> <p>18 Excuse me. How is Free Speech Systems</p> <p>19 covering their bills every month?</p> <p>20 A. So there are -- so there's income that the --</p> <p>21 that Free Speech makes off of the relationship with PQPR</p> <p>22 via the sales. PQPR also pays money to Free Speech for</p> <p>23 advertising on the website, that includes the banners</p> <p>24 and such. So that's -- and so, essentially, the way</p> <p>25 that the business makes money is -- is those two primary</p>
<p style="text-align: right;">239</p> <p>1 Q. Were you surprised when people started having</p> <p>2 to make charts and breakdowns of the different</p> <p>3 subsidiaries, who owned them and how many percent?</p> <p>4 A. No, not necessarily. I'm aware that businesses</p> <p>5 own shares through LLCs -- through other LLCs. So I</p> <p>6 don't think it's necessarily odd.</p> <p>7 Q. No. You're -- you're completely right.</p> <p>8 But are all of the holding LLCs typically</p> <p>9 going to be the -- a sole proprietor's parents or</p> <p>10 children or themselves?</p> <p>11 A. Oh, like I said, I don't know. I'm not</p> <p>12 qualified to answer that.</p> <p>13 Q. What's a spendthrift trust?</p> <p>14 A. I don't know if that's what this type of trust</p> <p>15 is. And, honestly, I don't have a background in trust</p> <p>16 and estates either, so I can't answer that.</p> <p>17 Q. So throughout this, no one even told you the</p> <p>18 AEJ Trust is a spendthrift? Nobody even told you that?</p> <p>19 A. I don't know what type of trust it is, no.</p> <p>20 Q. You didn't ask either, right?</p> <p>21 A. I know what the trust does. But...</p> <p>22 Q. Didn't ask you that.</p> <p>23 A. But, no, I don't ask -- I didn't ask what type</p> <p>24 of trust it was.</p> <p>25 Q. Okay. Why not, other than you didn't know to</p>	<p style="text-align: right;">241</p> <p>1 ways.</p> <p>2 Q. Okay. Let's look at the balance sheet that was</p> <p>3 provided. It's Exhibit 15, I believe.</p> <p>4 A. Okay.</p> <p>5 Q. That one (indicating). Yeah.</p> <p>6 So the balance sheet is for all of 2020,</p> <p>7 correct. You understand that?</p> <p>8 A. That's what it says.</p> <p>9 Q. Okay. And can you tell me where the income is</p> <p>10 that Infowars makes from PQPR for advertising?</p> <p>11 A. I don't know if this is not a specific line</p> <p>12 item. I know that there are -- there are line items</p> <p>13 more -- that would give this more specificity, but</p> <p>14 there's no way to tell from looking at this.</p> <p>15 Q. Do you know what the GAP is?</p> <p>16 A. What do you mean, the GAP?</p> <p>17 Q. Do you know what GAP means in this context that</p> <p>18 you're testifying about?</p> <p>19 A. I don't know what you mean by GAP.</p> <p>20 Q. I'm gonna represent to you it's not a store at</p> <p>21 the mall.</p> <p>22 A. I didn't think it was.</p> <p>23 Q. Generally accepted accounting principals.</p> <p>24 Do you know any of them?</p> <p>25 A. I'm not an accountant, so no.</p>

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<p style="text-align: right;">242</p> <p>1 Q. On a balance sheet, you use the term line item. 2 What's a line item? 3 A. A line item is more specific information on -- 4 on these numbers. 5 Q. Okay. So if there's not a specific line item, 6 there would still be a -- a broader category that would 7 encompass that income. 8 Can you tell me which one? 9 And if you don't know, I understand. 10 A. I don't know if it's -- if it's redacted here 11 under assets. So it may be in this redacted. But, like 12 I said, I don't know because it's redacted. 13 Q. Okay. But your best guess is that, that 14 redacted line item would be your interest made from 15 PQPR? 16 A. I -- I don't know. Like I said, I -- I don't 17 see the specific line item here for that. 18 Q. I have a question. 19 A. Sure. 20 Q. PQPR is owed \$53 million, according to you, 21 right? 22 A. About, yes. 23 Q. Why are they paying Infowars for advertising 24 when they could just keep that money and have the 25 amount -- the -- the note go down?</p>	<p style="text-align: right;">244</p> <p>1 A. Yes. Paying somebody in response -- in 2 response to things -- good or service that you received, 3 yes. 4 Q. You know what transfer means? 5 A. Transfer of money. 6 Q. Do you know what assets are? 7 A. Assets could be money, it could be other 8 items -- 9 Q. Okay. 10 A. -- including money. 11 Q. Has -- has Free Speech Systems transferred any 12 assets without an exchange of goods and services from 13 the time this lawsuit was filed to now? 14 A. That's a really broad question, and I don't 15 know how to answer it. 16 Q. Well, it's a very broad question, so it should 17 be easy to answer, based on your knowledge. If there's 18 not very many at all, then it wouldn't be hard at all 19 either. 20 A. I don't -- honestly, I didn't ask that 21 question, so I don't know how to answer it. 22 Q. So the broadness of the question doesn't 23 matter. 24 You just don't know one way or the other, 25 no matter how specific I get, true?</p>
<p style="text-align: right;">243</p> <p>1 A. I think that the -- the answer that I got when 2 I spoke to Mr. Roe and Mr. Jones was the efforts that 3 have been made to make sure their -- the two companies 4 are -- are not so financially entangled. So it's easier 5 to have them pay out the marketing and then have us 6 reimburse them than it is to just say, oh, just take it 7 off what I owe you. It makes for cleaner tracking. 8 Q. Okay. So for the first time in the history of 9 this case, we have something in the business from Free 10 Speech that's cleaner tracking. 11 This is where they decided they wanted to 12 be clean? 13 A. This only happened, like I said, within the 14 last few months. So... 15 Q. Before that, what was happening? 16 A. As I testified earlier, there really was no set 17 schedule to repay this debt or any set schedule to make 18 payments to PQPR for the costs of the products. So -- 19 so there really wasn't anything clean about it. 20 Q. Okay. The -- at any point since 2018 to today, 21 has Infowars transferred any assets without an exchange 22 of goods or services? 23 A. I don't -- I don't know what you mean. I'm 24 sorry. 25 Q. Do you know what goods and services are?</p>	<p style="text-align: right;">245</p> <p>1 A. True. I don't know specifically what you're 2 referring to, but I didn't ask that specific question -- 3 Q. Okay. 4 A. -- so I don't know the answer to it. 5 Q. Did you -- you reviewed the Interrogatory, 6 Exhibit 13? 7 A. Okay. Yes. 8 Q. Okay. So you see B? 9 A. I'm sorry. What page are you on? Is this 10 Page 4. 11 Q. Page 4, yeah. 12 A. Okay. 13 Q. Part B listed in it, it asks for all assets 14 transferred in any manner. 15 A. Okay. 16 Q. Okay. So with that said, were any of these 17 transfers done without an exchange -- a fair exchange of 18 goods and services? 19 A. What transfers are you referring to? 20 Q. Any at all. They didn't itemize them, and 21 that's why you are sitting in the chair to answer the 22 specific question. That's what you were tasked for. 23 A. What do you mean itemized transfers? 24 I don't see any transfers listed here. 25 Q. They're -- they're not itemized. And the</p>

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<p style="text-align: right;">246</p> <p>1 reason I'm asking you for the itemized information is 2 because you're tasked with telling us what this means. 3 A. I guess I don't understand the question. And 4 I'm sorry that might just be because I don't have a 5 background in this. 6 But it says a list of all assets 7 transferred. And there is a list of what assets the 8 company possesses, but I don't see where you're 9 referring to that there are transfers. 10 Can you point me to that. 11 Q. No, I can't. Because this answer doesn't give 12 them, which is why I'm asking you to give them to me 13 now. 14 A. Well, the answer is -- the answer here, as I 15 read it, it doesn't seem to be responsive to B at all. 16 It doesn't say that there's any transfers. 17 Q. You are completely right -- 18 A. Okay. 19 Q. -- which is why I'm asking. 20 A. You're assum- -- I guess my question is: 21 You're assuming there are transfers, but you're not 22 sure, and that is your question to me as to whether 23 there any transfers. 24 Q. Are there any transfers? 25 A. I don't know.</p>	<p style="text-align: right;">248</p> <p>1 Q. So you'd say, currently, as you sit there, you 2 are disseminating information that is unverified? Does 3 that sound familiar with regard to the defendant you're 4 sitting in that chair for? 5 A. I'm sorry. I don't understand the question. 6 Q. Sure. Free Speech Systems, they spit out a 7 bunch of information that is completely unverified; some 8 of it is just made up. 9 And you're sitting here today -- does -- 10 everything that you're giving us, you didn't verify? 11 A. I didn't independently verify these, no. 12 Q. You didn't even ask why Robert Roe, a 13 consultant that does not work for the company, had full 14 access to the company's books to the point where a year 15 and -- I don't know -- four months after the year was 16 over was able to go in and change numbers? You didn't 17 ask why, did you? 18 A. No. I asked why, and I gave you my answer as 19 to why. I know you -- I don't know if you don't 20 understand why. 21 But as far as verifying, I mean, like I 22 said, I didn't check these numbers myself. But I did 23 see the tax return forms, the Schedule Cs, these numbers 24 are -- are the same as the numbers that are on the 25 Schedule Cs.</p>
<p style="text-align: right;">247</p> <p>1 Q. Did you ask? 2 A. I did not ask. 3 Q. You would agree that's a pretty bad fact? 4 A. A bad fact as to what? 5 Q. That you didn't ask. 6 A. I did not ask. 7 Q. If you're sitting here -- I can read these 8 words. I understand all these words in this order. 9 A. Yes. 10 Q. Right? 11 You're sitting here to answer the 12 questions that these answers don't provide, and you 13 can't. 14 It's my -- it's my -- and correct me if 15 I'm wrong. But the same individuals that have 16 everything to lose in this case gave you these numbers 17 and answers and said, this is what -- that's what it is? 18 A. Well, I didn't do any independent analysis of 19 it. I don't have a background in accounting. So I 20 don't think I'm in a position to verify the accuracy of 21 these numbers. 22 Q. Right. 23 A. I asked for them, and I think that I -- I did 24 what I could in the time that was available to me, and 25 testifying as best as I can on it.</p>	<p style="text-align: right;">249</p> <p>1 MR. OGDEN: Ms. Blott -- 2 Let's stop there. 3 Ms. Blott, this witness, now for the 4 second time, has given me information that in 5 preparation for her testimony today relied on tax 6 records that have not been produced. 7 What are we gonna do about it? 8 It's kind of -- it's like a revolving door 9 at this point. 10 MS. BLOTT: It is not a complete tax 11 return. 12 MR. OGDEN: I don't care what it is. 13 Whatever she had, I want. 14 MS. BLOTT: Okay. I'm sorry. Are you 15 gonna let me finish? 16 MR. OGDEN: Not if it starts with that. 17 Go ahead. 18 MS. BLOTT: Just file your motion. 19 MR. OGDEN: I'm giving you a chance right 20 here to try and tread water a little longer. 21 MS. BLOTT: The Schedule C that she 22 reviewed, not the complete tax return, is not a 23 finalized Schedule C and has not been filed with the 24 Internal Revenue Service. 25 MR. OGDEN: But the witness relied on it</p>

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1 for her testimony right now. I don't understand where 2 the miscommunication is on my end. 3 MS. BLOTT: I don't know why she's 4 testifying that she relied on it. It has the same 5 numbers as what she's looking at now. 6 MR. OGDEN: How do you know? Have you 7 seen it? 8 MS. BLOTT: Yeah. 9 MR. OGDEN: Okay. Why hasn't it been 10 produced? 11 MR. BANKSTON: Why are we not producing it 12 right now at this very second? 13 MS. BLOTT: Do you want to continue with 14 the deposition? 15 MR. BANKSTON: Wow. 16 MR. OGDEN: I -- if that -- I'm literally 17 giving you, you know, a lifeline here to try and just 18 fix it. If you have it, hand it over. If not -- we can 19 cure it now. 20 But if that's -- if your response is file 21 your motion or would you like to continue, then I will. 22 MS. BLOTT: Well, here is my explanation. 23 It's an explanation; it's not an excuse. 24 Since the day I got on this case, I have 25 been working round the clock to get the production --	1 Do I physically have it -- have I had physical 2 possession of it? No. It's like -- 3 MR. OGDEN: How'd you see it? 4 MS. BLOTT: On a screen. 5 It's just like the Bates labeling -- or, 6 excuse me -- the financial documents. I received those 7 on Friday. 8 MR. OGDEN: I'm questioning Ms. Paz on net 9 worth. 10 MS. BLOTT: I understand that. 11 MR. OGDEN: When were you gonna give it to 12 me? After the depo? 13 MS. BLOTT: So what do you want to do? 14 MR. OGDEN: I don't know much more I can 15 do. 16 MS. BLOTT: Okay. 17 MR. OGDEN: I mean, this is every time I 18 turn the corner, I've got something new or something -- 19 I mean -- 20 MS. BLOTT: Okay. 21 MR. OGDEN: I think at this point, we 22 should suspend the depo so that we can brief this to the 23 Court, because the Court, in the hearing, was very 24 clear, that if there are any issues, to bring them to 25 her attention, and she will act swiftly so that the
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1 verify the documents you have been provided with are 2 full and complete documents. 3 As an example, I realized when I saw the 4 profit and loss and the balance sheet that it had not 5 been produced because of differences in opinions on the 6 definition of financial statement. 7 MR. BANKSTON: Brad Reeves says you're not 8 telling the truth, by the way. 9 I'm sorry. I didn't hear you. 10 MS. BLOTT: I said, oh, gee, surprise, 11 surprise. 12 MR. BANKSTON: Oh, so -- okay. So -- so I 13 just want to make sure we're clear on the record. 14 We're just going to go ahead and make the 15 assertion that it's not surprising that Brad Reeves said 16 something that you think is false, because I guess the 17 implication is Brad Reeves is a liar or has a propensity 18 for lying. And I certainly didn't find that Brad 19 Reeves. 20 MR. OGDEN: Okay. Let's just do this. I 21 think with where we're at now on this impasse, doesn't 22 seem like there's very much more we can do. If I don't 23 have the document, I'm not really hearing from you that 24 you're going to give it to me. 25 MS. BLOTT: I am going to give it to you.	1 trial date is not interrupted. 2 MS. BLOTT: Okay. 3 MR. OGDEN: Do you have a solution 4 different to that? 5 MS. BLOTT: No. 6 MR. OGDEN: Okay. Well, then we'll 7 suspend the deposition. 8 MR. BANKSTON: Actually, can I confer with 9 you for a couple of minutes about some questions? 10 MR. OGDEN: We won't suspend. Let's take 11 a five-minute break. 12 MS. BLOTT: You're not leaving with that 13 notebook in your hand. 14 THE REPORTER: Okay. Can we go off the 15 record? 16 MR. OGDEN: Yes. 17 THE VIDEOGRAPHER: We are off the record 18 at 2:57. 19 (Recess from 2:57 p.m. to 3:04 p.m.) 20 THE VIDEOGRAPHER: We are back on the 21 record at 3:04. 22 MR. OGDEN: We took a break. I think that 23 at this point it is the safest decision for all parties 24 to suspend any more testimony on net worth until we can 25 get a complete set of documents and -- and kind of have

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<p style="text-align: right;">254</p> <p>1 a understanding of what direction this is even going to 2 go. But I do have a couple of follow-ups. 3 MR. BANKSTON: There's one, two, three -- 4 they're marked. 5 Q. (By Mr. Ogden) And this is Exhibit -- 6 THE WITNESS: It's already -- I think it's 7 already marked. 8 THE REPORTER: You already marked it. 9 MR. OGDEN: I know. But I was gonna make 10 it 18B -- 18A and D so it's clean. 11 I know I should have been a court 12 reporter. I would have less gray in my hair. 13 (Exhibit 18A marked.) 14 Q. (By Mr. Ogden) I have marked a couple pages out 15 of your notes, and I want to ask you about it. 16 We'll start with Page -- what's marked as 17 18A out of Exhibit 18. 18 Do you see -- 19 A. Yes. 20 Q. -- see your notes there? 21 Okay. Where did these notes come from? 22 Which interview, or who were you talking to? 23 A. Can I flip back. 24 Q. You can do whatever you want. 25 A. Oh, this was a conversation I had with</p>	<p style="text-align: right;">256</p> <p>1 A. Well, not that it wasn't reliable, but that I 2 think he thinks that people are -- people associated 3 with certain entities are posting things on there to try 4 to -- like a breadcrumb to get him to pick up on bait. 5 So I think that that was the sum and substance of that 6 part of our conversation. 7 Q. What entities? 8 A. The democratic party, people in the government, 9 any other people that he -- he thinks are trying to 10 spread misinformation. 11 Q. Okay. And did Mr. Jones, after Pizzagate, come 12 out and definitively tell his staff that 4chan is not a 13 reliable source to be using? 14 A. Well, I think my note here says I told them not 15 to do it. So I think at some point he -- you know, he 16 did convey to them that if you're -- I know you're 17 looking at, but if you're gonna see something on there, 18 make sure that there's other sources. 19 Q. Okay. And in this case, the other source was a 20 Twitter post, correct? 21 A. I think that's what Mr. Daniels says in his 22 answer. But, yes, that he had seen it on social media; 23 that's correct. 24 Q. I'm not asking you about it the day after 25 tomorrow.</p>
<p style="text-align: right;">255</p> <p>1 Mr. Jones. 2 Q. Okay. And it says here at the top, perfect 3 place to post disinfo, hyphen, 4chan, underline. 4 Do you see that? 5 A. Yes. 6 Q. What did you think that means -- why did you 7 write that? 8 A. So this was a conversation I had with Mr. Jones 9 about using 4chan -- 10 THE WITNESS: I'm sorry that's -- 11 MR. OGDEN: It's okay. 12 THE WITNESS: -- my -- my father. 13 (Turning off phone.) 14 A. So this was a conversation I had with Mr. Jones 15 about using 4chan for material from which to draw, and 16 Mr. Jones' -- he -- he -- he -- as you can see after 17 that, I talked a lot about Pizzagate and operatives on 18 4chan. 19 And it's Mr. Jones' opinion that 4chan 20 is -- that people purposefully sometimes post 21 information on there for the purpose of misleading. And 22 he used Pizzagate as an example. But his position was 23 he didn't realize that at the time. 24 Q. But after Pizzagate, Mr. Jones realized 4chan 25 was not a reliable?</p>	<p style="text-align: right;">257</p> <p>1 A. Sure. 2 Q. But it is unquestionable -- you know, it's not 3 really any doubt in this case that what Kit Daniels did 4 was just wrong, right? 5 A. It was inaccurate; that's correct. I don't 6 think there's any dispute that the photograph was not of 7 the shooter. I don't think there's that dispute. 8 Q. And has anybody during your preparation told 9 you what Mr. Fontaine's gone through? 10 A. Has he gone through? I mean, I read through 11 the materials as far as what was posted on the internet 12 and in various comments on the internet. And I said I 13 read that letter from his therapist. So I have some 14 idea of what he's been through, yes. 15 Q. Do you know that Mr. Fontaine suffers from some 16 mental health issues? 17 A. Pre this post, yes, I am aware of that. 18 Q. And also post this post? 19 A. I -- I don't know about that. Like I said, I 20 read in the document that there weren't a lot of issues 21 post post. 22 Q. What do you know about his mental health pre 23 this incident? 24 A. You want me to testify as his -- as to the 25 diagnosis that I'm aware of?</p>

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<p>258</p> <p>1 Q. Nope. I want you -- I want you to tell us what 2 you know.</p> <p>3 A. Based on that material that I read that I just 4 referenced, his psychological -- it's not a psych 5 record. It would more adequately be characterized as a 6 letter from his psychologist. It summarizes his history 7 precontact with Mr. Fontaine, and it does diagnose him 8 with Asperger's.</p> <p>9 Q. Okay. Anything else that you know about 10 Mr. Fontaine?</p> <p>11 A. Apart from what's in that letter, no.</p> <p>12 Q. You know anything about Asperger's?</p> <p>13 A. I don't have any personal knowledge of what 14 Asperger's is, no.</p> <p>15 Q. Okay. I'll tell you it's -- it's on the 16 spectrum of autism.</p> <p>17 A. Okay.</p> <p>18 Q. And people that suffer from it are generally 19 very -- have a lot of social issues --</p> <p>20 A. Okay.</p> <p>21 Q. -- with their development and in their ongoing 22 adult life.</p> <p>23 Did you know that?</p> <p>24 A. Like I said, I don't have any personal 25 knowledge about Asperger's, and I'm not really qualified</p>	<p>260</p> <p>1 being misidentified by Infowars as the Parkland shooter?</p> <p>2 A. I don't know the extent to his damages. I 3 didn't say he didn't suffer damages. I don't know the 4 extent of his damages.</p> <p>5 Q. So we can agree that he did suffer damages?</p> <p>6 A. I don't -- I don't know.</p> <p>7 Q. Okay. Has anybody at Infowars told you that 8 people contacted Marcel privately through messaging and 9 made threats?</p> <p>10 A. I did not see any private communications in the 11 material that I reviewed --</p> <p>12 Q. It's --</p> <p>13 A. -- directly to Mr. Fontaine.</p> <p>14 Q. And I want you to understand that the reason 15 I'm asking you these questions is: I think with this 16 case, specifically with all of the documents and all of 17 the sanctions and all of the moving parts that you had 18 to deal with, with Bob Roe and Dustin Whittenburg and 19 Ms. Blott and Mr. Jones and Mr. Pattis and everyone else 20 that you had to go through to get to this point, I want 21 you to know there's a real person on the other side.</p> <p>22 A. Okay.</p> <p>23 Q. Go to the next one.</p> <p>24 One follow up.</p> <p>25 With the 4chan when Mr. Jones said not to</p>
<p>259</p> <p>1 to say what it is or what the symptoms are.</p> <p>2 Q. Okay. Well, you were tasked with the knowledge 3 of Mr. Fontaine.</p> <p>4 And when you saw what it was, you didn't 5 do anything and take any steps to figure out what that 6 meant, correct?</p> <p>7 A. Well, I was tasked with what was in the 8 company's knowledge of Mr. Fontaine, which was what was 9 in that letter.</p> <p>10 Q. Let me just ask --</p> <p>11 A. The definition of Asperger's is not contained 12 in that material. So...</p> <p>13 Q. I'm just asking as person.</p> <p>14 A. As a person, I did not do any independent 15 research as to what Asperger's is.</p> <p>16 Q. Do you have any personal feelings about what 17 happened in this case?</p> <p>18 A. I don't have any personal feelings, no.</p> <p>19 Q. What about the Sandy Hook case?</p> <p>20 A. I think I was asked that question yesterday.</p> <p>21 Q. Okay.</p> <p>22 A. I don't have any personal feelings, no.</p> <p>23 Q. Okay. Do you -- is it your position as the 24 company today to sit here and say that Marcel Fontaine 25 did not suffer any injuries or damages as a result of</p>	<p>261</p> <p>1 do it, you didn't ask him when he said that, right?</p> <p>2 A. Just based on my notes and just what I remember 3 of my notes, it -- I'm not sure when. He was 4 referencing in relation to Pizzagate, but I'm not sure. 5 (Exhibit 18B marked.)</p> <p>6 Q. (By Mr. Ogden) Okay. With -- with regard to 7 what's marked as 18B, bottom right corner, it says 8 Infowars, LLC, and then it says Jacobson circled.</p> <p>9 A. Uh-huh.</p> <p>10 Q. Why?</p> <p>11 A. Those two things are not connected.</p> <p>12 Q. Why are they in the same box?</p> <p>13 A. I was doodling.</p> <p>14 Q. Okay. Why do you have arrows pointing towards 15 it?</p> <p>16 A. I was doodling.</p> <p>17 Q. Do you remember testifying yesterday?</p> <p>18 A. I did testify yesterday.</p> <p>19 Q. Do you remember when you said you had never 20 heard of affiliated relations?</p> <p>21 A. Yes.</p> <p>22 Q. Do you want to take a look a little bit higher 23 than the first box I pointed you to.</p> <p>24 What's that say in quotations in your 25 notes?</p>

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<p style="text-align: right;">262</p> <p>1 A. That was when you referenced it to me on the 2 record. These are my notes from yesterday's deposition. 3 And so I made a note because you asked me the questions 4 regarding that, and I didn't know the answer. 5 Q. Okay. So you wrote this yesterday during the 6 depo or... 7 A. Yes. Those are my notes from yesterday -- 8 well, I wouldn't call them notes, most of them doodles. 9 But those are from yesterday. 10 Q. Okay. 11 MR. BANKSTON: I think that's the same 12 notes. 13 MR. OGDEN: Yeah. This is probably the 14 same thing. 15 Q. (By Mr. Ogden) Which -- do you remember which 16 document Bradley Reeves never produced we were talking 17 about in 18C? 18 (Exhibit 18C marked.) 19 A. That was in response -- this is today's notes. 20 It's dated. This was in -- this is the note of your 21 discussion with Attorney Blott about the financial 22 document that wasn't produced and the discussion back 23 and forth about whether it should have been produced or 24 not. 25 Q. (By Mr. Ogden) Okay. With -- with how this</p>	<p style="text-align: right;">264</p> <p>1 circumstances involved. And I think the depo's being 2 suspended just because you don't have documents. I 3 don't -- I don't think that has -- really relates to my 4 testimony. But... 5 Q. Okay. Then I'll clear that up just so there's 6 no confusion. 7 Tell me the information that's in the 8 Schedule C that you reviewed in preparing for you 9 testimony. 10 A. Oh, I can't cite to it, as I sit here. 11 Q. You have it memorized? 12 A. I do not have it memorized. 13 Q. So you're not prepared to talk about it, if you 14 don't have the document in front of you? 15 A. I can't talk about it if it isn't in front of 16 me. 17 Q. Okay. That's what -- 18 MR. OGDEN: We'll go ahead and go off the 19 record. We'll suspend there. 20 MS. BLOTT: Okay. I have -- 21 THE VIDEOGRAPHER: Off the record? 22 MR. OGDEN: Stay on. Ms. Blott would like 23 to make a record. 24 25</p>
<p style="text-align: right;">263</p> <p>1 depo's gone, how do you think you did? 2 A. I think I did pretty good, depending just not 3 how -- obviously, I can't have all of the information 4 about everything under the sun. But given the task, I 5 think I did okay. 6 Q. You had eight topics, right? 7 A. Yes. 8 Q. You realize that you were not prepared to 9 discuss five -- three of them? 10 A. Okay. 11 Q. Okay. So you still think that's a passing 12 score? 13 A. Do you want me to give myself a rate from 0 to 14 100? 15 Q. If you want to. 16 A. I'm sorry? 17 Q. I said if you would like to. 18 A. I'm asking what you would like for me in my 19 answer. 20 Q. I was just asking if you thought you -- now -- 21 now that we are at this point in the depo having to 22 suspend the last topic for a number of reasons, if you 23 thought -- if you still thought now, like you did at 24 beginning, which is that you were prepared? 25 A. I think I did a decent job, given all the other</p>	<p style="text-align: right;">265</p> <p>1 EXAMINATION 2 BY MS. BLOTT 3 Q. Ms. Paz, did -- you testified that you did not 4 read the Court's order with respect to the motion to 5 compel and for sanctions -- 6 MR. OGDEN: I'll object. 7 Q. (By Ms. Blott) -- on the corporate -- 8 MR. OGDEN: I'll object to leading. 9 A. Yes, I did. 10 Q. (By Ms. Blott) Did you see the order? 11 MR. OGDEN: Same objection. 12 A. The order regarding the sanctions? 13 I -- I don't know that I saw it. I think 14 we talked about it. 15 MR. OGDEN: I'm going to object to 16 nonresponsive. 17 A. I don't -- I don't remember seeing it. 18 Q. (By Ms. Blott) Did you have conversations with 19 anyone about the judge's expectations? 20 A. I did have conversations with counsel. 21 Q. Was it your understanding that you were trying 22 to determine the viewership based on the judge's ruling? 23 A. Yes. 24 Q. Did you -- was it your understanding that the 25 judge gave instructions on specific things that could be</p>

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<p style="text-align: right;">266</p> <p>1 done to determine that?</p> <p>2 MR. OGDEN: Object to leading.</p> <p>3 A. Yes.</p> <p>4 Q. (By Ms. Blott) Did you -- what was your</p> <p>5 understanding of what was suggested by the judge to be</p> <p>6 done?</p> <p>7 A. As I said, I didn't read the order. But based</p> <p>8 on my conversation with counsel, the judge had suggested</p> <p>9 that we try to determine the number of orders that were</p> <p>10 placed on the days that those broadcasts were aired, and</p> <p>11 I believe we did that.</p> <p>12 Q. Okay. And did you speak with someone at</p> <p>13 Infowars about doing that?</p> <p>14 A. The number of orders? Yes. I spoke to</p> <p>15 somebody at the warehouse. She worked -- well, I don't</p> <p>16 think she works for Infowars. I think she might work</p> <p>17 for PQPR.</p> <p>18 Q. In the over-- you've test-- with respect to</p> <p>19 the documents that you reviewed in preparation for your</p> <p>20 testimony in the Sandy Hook cases, were those documents</p> <p>21 separated between the two cases, meaning Sandy Hook and</p> <p>22 Fontaine?</p> <p>23 A. There was a Fontaine folder with production in</p> <p>24 that specific case; but, otherwise, most of the</p> <p>25 documents were just Sandy Hook documents.</p>	<p style="text-align: right;">268</p> <p>1 between how it appears?</p> <p>2 Q. Yes.</p> <p>3 A. I mean, I don't have any technology on that,</p> <p>4 no.</p> <p>5 Q. Okay. And you made references several times to</p> <p>6 posts.</p> <p>7 Were there times that you were referring</p> <p>8 to actual posts on the internet versus posts that were</p> <p>9 produced as hard copies?</p> <p>10 Because I was confused about that.</p> <p>11 MR. OGDEN: I'm gonna object to leading.</p> <p>12 A. I -- I don't understand the question.</p> <p>13 MS. BLOTT: Okay. Pass the witness.</p> <p>14 MR. OGDEN: Got quite a bit of follow ups</p> <p>15 now that we did that.</p> <p>16 FURTHER EXAMINATION</p> <p>17 BY MR. OGDEN</p> <p>18 Q. Fontaine folder, correct?</p> <p>19 A. There was -- on the Dropbox, there was a folder</p> <p>20 labeled Fontaine on it, yes.</p> <p>21 Q. Who labeled it?</p> <p>22 A. I didn't label it. I don't know who labeled</p> <p>23 it.</p> <p>24 Q. Who sent it to you?</p> <p>25 A. It was on the Dropbox. It wasn't sent to me.</p>
<p style="text-align: right;">267</p> <p>1 Q. Okay. Were the documents in the Sandy Hook</p> <p>2 folder equally pertinent to Fontaine in some instances</p> <p>3 as it relates to the notice of deposition?</p> <p>4 A. In some instances, yes.</p> <p>5 MR. OGDEN: Well, we're gonna be here a</p> <p>6 while.</p> <p>7 Q. (By Ms. Blott) Did you have any conversations</p> <p>8 with employees regarding editorial conversations?</p> <p>9 A. I asked employees. Specifically, I spoke to</p> <p>10 Adan, to Mr. Jones, to -- to Mr. Daniels regarding</p> <p>11 whether or not they had editorial discussions, and that</p> <p>12 would include, I guess, personal discussions. And I</p> <p>13 confirmed that there -- they wouldn't -- they didn't</p> <p>14 have any editorial discussions. The only discussion</p> <p>15 that Mr. Salazar recalled -- I think we talked about</p> <p>16 this yesterday in connection Mr. Jacobson. That wasn't</p> <p>17 regarding the Fontaine case, though, that was regarding</p> <p>18 the Sandy Hook case. But other than that...</p> <p>19 Q. Do you know -- do you know the distinction</p> <p>20 between how electronic data is printed and hard form</p> <p>21 versus web pages?</p> <p>22 A. How it's printed versus how it appears on a web</p> <p>23 page?</p> <p>24 Q. Yes.</p> <p>25 A. You mean how -- how -- is there a difference</p>	<p style="text-align: right;">269</p> <p>1 Q. Is the Dropbox protected?</p> <p>2 A. What do you mean is it protected?</p> <p>3 Q. Does it require a password or does it require</p> <p>4 an invite, or is it --</p> <p>5 A. It required an invite, yes.</p> <p>6 Q. Who invited you?</p> <p>7 A. It was our consultant at the time. I don't</p> <p>8 think he's our consultant anymore.</p> <p>9 Q. What's his name?</p> <p>10 A. Chris LaTronica.</p> <p>11 Q. LaTronica. Just laughing when I write that</p> <p>12 name because there's no way me or the court reporter can</p> <p>13 get that one right.</p> <p>14 A. It's L-a, capital, T-r-o-n-i-c-a.</p> <p>15 Q. Okay. And Mr. LaTronica is a criminal defense</p> <p>16 attorney in Brooklyn, New York.</p> <p>17 A. I believe so, yes.</p> <p>18 Q. Okay. So your electronic consultant's a</p> <p>19 criminal defense attorney in Brooklyn.</p> <p>20 When was he brought on as your consultant?</p> <p>21 A. I don't know. I know he's been involved in the</p> <p>22 case longer than I have.</p> <p>23 Q. Okay.</p> <p>24 A. So I don't know.</p> <p>25 Q. So as far as preservation and issues with</p>

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<p style="text-align: right;">270</p> <p>1 document production and possibly altered or -- or 2 corrupted documents, he would be a person that we would 3 want to talk to, correct? 4 A. I don't think that's accurate. I think all he 5 did was organize the folders. I don't think he had any 6 responsibility in production of any documents. 7 Q. When did he organize the folders? 8 A. I don't know when he did it. 9 Q. Before you came on? 10 A. Before and probably during. They were actively 11 being reorganized. 12 Q. Okay. The -- what -- what files were in the 13 Fontaine folder that Chris LaTronica put together for 14 you? 15 A. Those would be the -- whatever we had regarding 16 what we produced. And, as I indicated, there were also 17 files in there that the plaintiffs produced that had 18 your Bates numbers on it. 19 Q. Did you ask if that was a complete set of all 20 files produced by plaintiffs and defendants? 21 A. I don't know if it's a complete set. 22 Q. The judge tasked you with reading every single 23 document produced, right? 24 A. Yes. But I don't know -- like I said earlier, 25 there's been an issue with me seeing what's been</p>	<p style="text-align: right;">272</p> <p>1 for the financials and a second time for a second 2 deposition, if that's your question. 3 Q. Financials weren't a topic yesterday, were 4 they? 5 A. I wasn't asked about it, no. 6 Q. Yet you still prepared? 7 A. I prepared on the financials. 8 Q. Okay. Well, it sounds like you prepared for 9 the financials for Sandy Hook and for Fontaine? 10 A. I prepared to speak on the financials, and I 11 thought I would be asked them at -- at yesterday's 12 deposition. 13 Q. What made you think that? 14 A. That's -- that was my impression, but 15 apparently it was inaccurate. 16 Q. Did you read the depo notices? 17 A. I did. 18 Q. They weren't identical. 19 You understand that, right? 20 A. I understand they're not identical. 21 Q. Nothing in the deposition topics you were 22 tasked with being prepared yesterday had anything to do 23 with the financials, correct? 24 A. Okay. 25 Q. Correct?</p>
<p style="text-align: right;">271</p> <p>1 produced in each and every case and whether I had the 2 complete production. So I -- I don't know, as I sit 3 here, if it was complete. 4 Q. You said that there was a number of documents 5 that were pertinent during the Sandy Hook doc review 6 that were pertinent to the Fontaine case. 7 A. Sure. 8 Q. Okay. Which ones? 9 A. So I think the financials documents, there were 10 [sic] overlap. I think that this issue of editorial 11 discussions, there are overlap. I think that the issue 12 of sourcing of materials, there's overlap. 13 Q. Okay. Why were the financial documents in 14 Sandy Hook pertinent to Fontaine? 15 A. They're the same financial statements from the 16 company, whether it's Fontaine or Sandy Hook. So... 17 Q. Yeah. But you weren't tasked and did not 18 testify on the financial -- on the financial issues with 19 the company in the Sandy Hook deposition yesterday. 20 A. No. I wasn't asked questions about it. 21 Q. So why did you spend time prepping? 22 A. I spent one amount of time prepping for the 23 financials. 24 Q. Okay. Right. Because -- 25 A. I mean, I didn't prep once for one deposition</p>	<p style="text-align: right;">273</p> <p>1 A. I don't remember, as I sit here today. 2 Q. Yet. Over the last two weeks, you've been 3 going through financial docs for -- you know, for the 4 Sandy Hook case, it seems. 5 A. No. I think what I testified to was when I got 6 here I was talking to people about the financials. I 7 didn't have the financial materials prior, arriving 8 here. So it hasn't been two weeks, no. 9 Q. Well, you prepped for the financial stuff just 10 for Fontaine, true? 11 A. Sure. 12 Q. Otherwise, you wasted a bunch of time doing it 13 for the Sandy Hook depositions because you weren't asked -- 14 you weren't tasked with it in the topics. 15 I mean, I'm completely lost. 16 A. Sir, there's no separate preparation that would 17 have been required. So you -- the way you're phrasing 18 your question is that I would have prepped it once for 19 Sandy Hook and then I would have prepped it a second 20 time for Fontaine. 21 Q. No. 22 A. And that's not what I'm testifying to. 23 I'm saying that I reviewed materials 24 regarding financials for both -- you know, just for the 25 depositions. And I was under the impression you were</p>

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<p style="text-align: right;">274</p> <p>1 gonna ask them [sic] about it yesterday, but you didn't, 2 and so that was my error. 3 But I didn't make two separate 4 preparations for -- for one case versus the other. 5 Q. I don't think you understood my question, but I 6 think you ended up giving the answer kind of right 7 eventually. 8 What other -- other than the financials, 9 which I'm still not sure how they are pertinent in any 10 way to the Sandy Hook documents that you were tasked. 11 What other documents were in the Sandy 12 Hook folders and not in the Fontaine ones that you found 13 pertinent to the Fontaine case? 14 A. Did I just -- I think I just said the 15 sourcing -- the issues regarding the sourcing and the -- 16 I forgot what my answer was. 17 Q. Uh-huh. 18 A. Sourcing and one other thing I said. 19 Q. Okay. So the documents about sourcing. 20 Because the -- and the -- and the sourcing 21 had a little bit of overlap, maybe. 22 But the Fontaine topics were very 23 specific; you would agree? 24 A. Sure. 25 Q. The Sandy Hook ones were more broad?</p>	<p style="text-align: right;">276</p> <p>1 this particular case. I don't know to the extent that 2 was conveyed to Mr. Daniels. 3 Q. Okay. 4 A. But, as I said, Mr. -- Mr. Salazar and the 5 three individuals, they sit together, generally, and 6 they pass around their -- their articles. So I suppose 7 you could term that an editorial discussion; although, I 8 don't think it's formally an editorial discussion. 9 Q. Well, an editorial discussion would be as if -- 10 if Mr. Daniels and Adan and a couple other writers got 11 together about a post, and after having the editorial 12 discussion decided to take it down, right? 13 A. If that happened. Because I'm not sure that 14 that was -- that's what happened. When I -- so when 15 I -- when I talked to Adan, he -- he was -- he's told me 16 that he thought that he spoke to everybody, but I don't 17 know that that was conveyed to Kit. 18 Q. Did you ever -- I understand that you had some 19 issues with the definition of editorial discussion; is 20 that fair? 21 A. That's fair. 22 Q. Okay. Did you -- did you relay that to 23 Ms. Blott? 24 A. Did -- that I had an issue with it? 25 Q. That you didn't know exactly what it was or</p>
<p style="text-align: right;">275</p> <p>1 A. Sure. 2 Q. Okay. Well, other than that, what -- what 3 other -- what other topics did you find pertinent to 4 Ms. Blott's question as far as you -- stuff you looked 5 at in the Sandy Hook folders also was pertinent to the 6 Fontaine preparation? 7 A. I forgot what I said in addition to sorting -- 8 to sourcing. 9 Q. I did too. 10 And so we can just move on. 11 A. Sure. 12 Q. You also said that there is no such thing as 13 editorial discussions in response to Ms. Blott's 14 questioning. 15 You remember that? 16 A. Right. I think this was a topic we spoke about 17 yesterday, as well. 18 Q. Can you think of one editorial discussion that 19 you came across in your preparation for today? 20 A. Well, I think -- and I said this yesterday -- 21 my -- my problem was with the term editorial discussion, 22 just assuming that it happens on a regular basis. 23 But it sound to me like -- in connection 24 with Fontaine, when I spoke to Mr. Salazar, there may 25 have been some discussion about Mr. Fontaine -- about</p>	<p style="text-align: right;">277</p> <p>1 what qualified or constituted an editorial discussion. 2 A. That's not what my problem is with the term. 3 Q. What's your problem with the term? 4 A. The term is -- the problem is, is I don't think 5 that what is happening here could be termed an editorial 6 discussion, and I think I raised that issue yesterday. 7 Q. What's an editorial discussion? 8 A. So I think that -- 9 Q. Not what you think. 10 What is an editorial discussion? 11 A. An editorial discussion would be a -- a 12 conversation amongst people about what should or 13 shouldn't be published, whether or not the articles 14 are -- are grammatically correct, whether they are 15 being -- the sources are written in there appropriately. 16 I think that's an editorial discussion. 17 Q. How did you come to that understanding of that 18 being an editorial discussion? 19 A. That's just based on my conversations. It's 20 not a definition anybody provided to me. 21 Q. Okay. If the judge was very clear on what she 22 expected the corporate deposition notice -- or, excuse 23 me -- the corporate representative deposition to be -- 24 sorry -- let me back up here. 25 If Judge Guerra Gamble, on the record,</p>

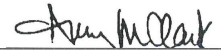

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<p style="text-align: right;">278</p> <p>1 clearly defined what an editorial -- what an editorial 2 discussion was to both myself, Mr. Bankston, and 3 Ms. Blott, would that -- would that definition what she 4 expected you to be prepared to do, would that be 5 important to you in preparing for today? 6 A. Sure. As I said, I didn't read the exact 7 order, but I did have a conversation with Attorney Blott 8 about it. 9 Q. Okay. But what the judge is -- okay. So 10 it's -- but you didn't -- you said that -- how much of 11 your definition of editorial discussion came from 12 Ms. Blott? 13 A. I am aware that the judge wanted me to also 14 find out whether there were any hallway conversations. 15 I don't know if that was the exact term. But, as I 16 said, when I asked these people those questions, there 17 were no such discussions. 18 Q. What'd you ask them? 19 A. What did I ask or who? 20 Q. What? What questions were you asking these 21 people? 22 A. I asked Adan and Kit and I believe I asked 23 Daria, as well, whether they had any discussions and at 24 any point in time with anybody about these cases, and 25 the answer was no, with the caveat of what I've already</p>	<p style="text-align: right;">280</p> <p>1 CHANGES AND SIGNATURE 2 WITNESS NAME: BRITTANY PAZ, CORPORATE REPRESENTATIVE OF FREE SPEECH SYSTEMS, LLC 3 DATE OF DEPOSITION: February 15, 2022 4 PAGE LINE CHANGE REASON 5 _____ 6 _____ 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 _____ 21 _____ 22 _____ 23 _____ 24 _____ 25 _____</p>
<p style="text-align: right;">279</p> <p>1 testified to. 2 Q. Okay. 3 MR. OGDEN: I think that will be all the 4 redirect I have, other than to just preserve that this 5 will be suspended as far as the last topic, which is the 6 net worth. 7 THE VIDEOGRAPHER: We are off the record 8 at 3:34. 9 (Proceedings concluded at 3:34 p.m.) 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">281</p> <p>1 I, BRITTANY PAZ, CORPORATE REPRESENTATIVE OF FREE 2 SPEECH SYSTEMS, LLC, have read the foregoing deposition 3 and hereby affix my signature that same is true and 4 correct, except as noted above. 5 _____ 6 _____ 7 BRITTANY PAZ, 8 CORPORATE REPRESENTATIVE OF FREE SPEECH SYSTEMS, LLC 9 _____ 10 THE STATE OF _____) 11 COUNTY OF _____) 12 _____ 13 Before me, _____, on this day 14 personally appeared BRITTANY PAZ, CORPORATE 15 REPRESENTATIVE OF FREE SPEECH SYSTEMS, LLC, known to me 16 or proved to me (under oath or through 17 _____) (description of identity 18 card or other document) to be the person whose name is 19 subscribed to the foregoing instrument and acknowledged 20 to me that he/she executed the same for the purpose and 21 consideration therein expressed. 22 _____ 23 _____ 24 _____ 25 _____</p>

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<p>1 Given under my hand and seal of office on this _____</p> <p>2 day of _____, _____.</p> <p>3</p> <p>4 _____</p> <p>5 NOTARY PUBLIC IN AND FOR</p> <p>6 THE STATE OF _____</p> <p>7 My Commission Expires: _____</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 of time used by each party at the time of the</p> <p>2 deposition:</p> <p>3 Mr. Bill Ogden (5h19m)</p> <p>Attorney for Plaintiff</p> <p>4 Mr. Mark Bankston (0h0m)</p> <p>Attorney for Plaintiff</p> <p>5 Ms. Jacquelyn Blott (0h05m)</p> <p>Attorney for Defendants</p> <p>6 That a copy of this certificate was served on all</p> <p>7 parties shown herein on _____ and filed</p> <p>8 with the Clerk.</p> <p>9 I further certify that I am neither counsel for,</p> <p>10 related to, nor employed by any of the parties in the</p> <p>11 action in which this proceeding was taken, and further</p> <p>12 that I am not financially or otherwise interested in the</p> <p>13 outcome of this action.</p> <p>14 Further certification requirements pursuant to</p> <p>15 Rule 203 of the Texas Code of Civil Procedure will be</p> <p>16 complied with after they have occurred.</p> <p>17 Certified to by me on this 21st day of February,</p> <p>18 2022.</p> <p>19</p> <p>20 </p> <p>21 Amy M. Clark, CSR</p> <p>Texas CSR 8753</p> <p>22 Expiration: 10/31/2023</p> <p>Res Ipsa Litigation Support, LLC</p> <p>23 Firm No. 11371</p> <p>501 Congress Avenue, Suite 150</p> <p>24 Austin, Texas 78701</p> <p>(512) 334-6777</p> <p>25</p>
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<p>1 CAUSE NO. D-1-GN-18-001605</p> <p>2 MARCEL FONTAINE,) IN THE DISTRICT COURT</p> <p>3)</p> <p>4 Plaintiff,)</p> <p>5)</p> <p>6 vs.) TRAVIS COUNTY, TEXAS</p> <p>7)</p> <p>8)</p> <p>9 INFOWARS, LLC, FREE)</p> <p>10 SPEECH SYSTEMS, LLC, and)</p> <p>11 KIT DANIELS,)</p> <p>12)</p> <p>13 Defendants.) 261ST JUDICIAL DISTRICT</p> <p>14</p> <p>15 REPORTER'S CERTIFICATE</p> <p>16 ORAL AND VIDEOTAPED DEPOSITION OF BRITTANY PAZ,</p> <p>17 CORPORATE REPRESENTATIVE OF FREE SPEECH SYSTEMS, LLC</p> <p>18 February 15, 2022</p> <p>19 I, Amy M. Clark, Certified Shorthand Reporter in and</p> <p>20 for the State of Texas, hereby certify to the following:</p> <p>21 That the witness, BRITTANY PAZ, CORPORATE</p> <p>22 REPRESENTATIVE OF FREE SPEECH SYSTEMS, LLC, was duly</p> <p>23 sworn and that the transcript of the deposition is a</p> <p>24 true record of the testimony given by the witness;</p> <p>25 That the deposition transcript was duly submitted on</p> <p>_____ to the witness or to the attorney for</p> <p>the witness for examination, signature, and return to me</p> <p>by _____.</p> <p>That pursuant to information given to the deposition</p> <p>officer at the time said testimony was taken, the</p> <p>following includes all parties of record and the amount</p>	<p>1 FURTHER CERTIFICATION UNDER TRCP RULE 203</p> <p>2</p> <p>3 The original deposition was/was not returned to the</p> <p>4 deposition officer on _____.</p> <p>5 If returned, the attached Changes and Signature</p> <p>6 page(s) contain(s) any changes and the reasons therefor.</p> <p>7 If returned, the original deposition was delivered</p> <p>8 to Bill Ogden, Custodial Attorney.</p> <p>9 \$_____ is the deposition officer's charges to the</p> <p>10 Plaintiff for preparing the original deposition and any</p> <p>11 copies of exhibits;</p> <p>12 The deposition was delivered in accordance with Rule</p> <p>13 203.3, and a copy of this certificate, served on all</p> <p>14 parties shown herein, was filed with the Clerk.</p> <p>15 Certified to by Res Ipsa Litigation Support, LLC on</p> <p>16 this _____ day of _____, _____.</p> <p>17</p> <p>18</p> <p>19 </p> <p>20</p> <p>21 Res Ipsa Litigation Support, LLC</p> <p>Firm No. 11371</p> <p>22 501 Congress Avenue, Suite 150</p> <p>Austin, Texas 78701</p> <p>23 (512) 334-6777</p> <p>24</p> <p>25</p>

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